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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of California-American Water
Company (U210W) for Authorization to Increase
its Revenues for Water Service by \$55,771,300 or
18.71% in the year 2024, by \$19,565,300 or 5.50%
in the year 2025, and by \$19,892,400 or 5.30% in
the year 2026.

Application 22-07-XXX

DIRECT TESTIMONY OF STEPHEN (WES) OWENS
(FINAL APPLICATION)

Sarah E. Leeper
Nicholas A. Subias
Cathy Hongola-Baptista
California-American Water Company
555 Montgomery Street, Suite 816
San Francisco, CA 94111
(415) 863-2960
sarah.leeper@amwater.com

Lori Anne Dolqueist
Willis Hon
Nossaman LLP
50 California Street
34th Floor
San Francisco, CA 94111
(415) 398-3600
ldolqueist@nossamna.com

Attorneys for California-American Water Company

Dated: July 1, 2022

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1 **BEFORE THE PUBLIC UTILITIES COMMISSION**
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3
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5 Company (U210W) for Authorization to Increase
6 its Revenues for Water Service by \$55,771,300 or
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8 5.50% in the year 2025, and by \$19,892,400 or
9 5.30% in the year 2026.

Application 22-07-XXX

10 **DIRECT TESTIMONY OF STEPHEN (WES) OWENS**
11 **(FINAL APPLICATION)**

12 **I. INTRODUCTION**

13 Q1. Please state your name, business address, and telephone number.

14 A1. My name is Stephen (Wes) Owens. My business address is 520 Capitol Mall,
15 Sacramento, CA 95814.

16
17 Q2. By whom are you employed and in what capacity?

18 A2. I am employed by California-American Water Company (“California American Water”
19 or the "Company") as the Director of Rates in the Rates & Regulatory Department.

20
21 Q3. Please briefly outline your responsibilities as the Director of Rates.

22 A3. I am responsible for the analysis and preparation of rate proceedings, advice letters, and
23 other applications before the California Public Utilities Commission (“Commission”).

24
25 Q4. Briefly describe your education background.

26 A4. I received a Bachelor of Science in Civil Engineering, with a minor in Managerial
27 Economics, from the University of California at Davis. I also have a Master’s in
28 Business Administration from the University of California at Davis. I am a licensed

Professional Engineer and a certified D2 Water Distribution Operator and T2 Water Treatment Operator in California. Additionally, I attended the general rate case training conducted by the National Association of Regulatory Utility Commissioners.

Q5. Please describe your professional experience.

A5. Prior to joining California American Water, I was employed by the San Jose Water Company ("SJWC") in the role of Manager, and then Director of Regulatory Affairs from October of 2010 through January of 2017. In that role, I oversaw SJWC's Regulatory Department and managed all filings with the Commission. Prior to that, I was employed within the Commission's Division of Ratepayer Advocates as a Utilities Engineer in the Water Branch from September 2008 through September 2010. In that role, I performed engineering analysis and testified as an expert witness in various General Rate Case proceedings involving Class A water utilities. I began my professional career with Cunningham Engineering Corporation, where I was employed as a Project Engineer from August 2003 through May 2007. In that role, I acted as a civil design engineer and project manager on projects of varying complexity.

Q6. Have you previously testified before utility regulatory commissions?

A6. Yes. I have previously testified before the Commission.

II. PURPOSE OF TESTIMONY

Q7. What is the purpose of your testimony?

A7. My testimony supports various aspects of California American Water's statewide general rate case ("GRC"). I am responsible for the overall management of the team responsible for the development and filing of the general rate case application in this proceeding. I have direct responsibility for several items in this Application. I will provide an overall summary of the Application and address the Rate Case Plan Minimum Data Request content and referencing. Additionally, I will address operation and maintenance

1 (“O&M”) and administrative and general (“A&G”) expenses, regulatory compliance
2 issues, chemical cost balancing account, corporate headquarters transition, and
3 ratemaking integration of acquisitions. A list of witnesses and their areas of
4 responsibilities in this Application is provided in the Direct Testimony of Kevin Tilden.
5

6 **III. OVERALL SUMMARY OF APPLICATION**

7 Q8. What is the scope of this Application?

8 A8. This Application includes all of California American Water’s existing water and
9 wastewater operations. In addition, California American Water has acquired or is in the
10 process of acquiring several systems since its last statewide GRC. Operational
11 integration of these acquisitions is discussed in Section VIII of the Testimony of Garry
12 Hofer. Below in Section XI of this testimony, I discuss the ratemaking integration of
13 these acquisitions as well as the current status of each acquisition proceeding.
14

15 Q9. Please provide a summary of California American Water’s revenue requirement request
16 in this Application.

17 A9. California American Water is requesting a statewide increase of \$55,771,300 or 18.71%
18 in the year 2024, by \$19,565,300 or 5.50% in the year 2025, and by \$19,892,400 or
19 5.30% in the year 2026. A breakdown of these increases by Division and District is
20 provided in the Application for this proceeding.
21

22 Q10. Please describe how California American Water has structured its Application.

23 A10. California American Water has structured its Application to comply with the
24 requirements outlined in the Rate Case Plan (“RCP”) in Decision (“D.”) 04-06-018 and
25 D.07-05-062.
26

27 Minimum Data Requirements (“MDRs”): The MDRs contain California American
28 Water’s Results of Operations (“RO”) from 2014 through 2023 as summarized below.

	Period
Five-year historical period	2017-2021
Estimated Years	2022-2023
Test Year 1	2024
Escalation Yr (expenses), Test Year 2 (rate base)	2025
Attrition Year	2026

The RO includes the revenue requirement components used to calculate revenues, expenses, and rate base as required by the MDRs and how they compare to the last authorized test year. In this Application, California American Water has used a last authorized test year of 2021.

The MDRs also provide information on California American Water's operations beyond the revenue requirement calculations. This includes details on its Urban Water Management Plans ("UWMPs"), water loss audits, leaks, supply sources, storage capacities, conservation, service and water quality, corporate and unregulated activities, and rate design. Each area has been cross referenced to supporting testimony and workpapers as required in the RCP.

Q11. Please explain the expense data in the RO model.

A11. The expense data is split between recorded data and forecast data. Recorded data represents 2017 through 2021 information pulled from the general ledger and reasonably adjusted for various items, such as costs that are not subject to rate recovery or one-time expenses, consistent with regulatory practice. This may include charitable contribution and/or lobbying costs, etc. Costs that are addressed beyond the scope of the base revenue requirement may also be excluded. While every effort was made to perform these adjustments in good faith, there are no guarantees every single record from the accounting system that should have been adjusted was discovered during the review.

1 After adjustments are made, the net results are escalated to present day dollars, after
2 which a five-year average is calculated. This five-year average may or may not be used
3 to forecast test year expenditures depending on the nature of the expense. For example,
4 while historical purchased water costs are provided for informational purposes, California
5 American Water uses its demand forecast and the latest purchased water rates to predict
6 future cost levels. This ensures that costs are in sync with current rates and production
7 figures, which usually do not conform to an escalated five-year average. Other
8 deviations to the five-year average and the reasons for such deviations are discussed
9 further in Sections V and VI of my testimony.
10

11 Q12. Were any changes made from the proposed application to the final application?

12 A12. Yes. These changes are summarized in Attachment 7.
13

14 **IV. SALARIES AND PAYROLL**

15 Q13. Please describe the forecasting methodology for Salaries and Payroll.

16 A13. Salaries and Payroll costs include the following components:
17

- 18 • Projected Labor Expenses
- 19 • Non-Union Labor Inflation
- 20 • Labor Inflation
- 21 • Market Based Compensation
- 22 • Overtime and Standby Pay
- 23 • Capitalization
- 24

25 The general approach and the methodology used to forecast these items are addressed
26 below.
27

28 Q14. Can you describe California American Water's current staffing level?

1 A14. Yes, current staffing levels includes the three “hired positions” identified in Section VII
2 and Exhibit B of the Direct Testimony of Garry Hofer. These are positions that were
3 hired, or are in the process of being filled, at the time of filing, even though they were not
4 funded in rates in D.21-11-018. As detailed in Mr. Hofer’s testimony, California
5 American Water determined that each of these hires was reasonable and necessary to
6 provide safe and reliable service to our customers and that waiting until a Decision in this
7 Application to fill them was not feasible. The addition of these “hired positions”
8 generates the current staffing as shown in Table A below. Detailed support and
9 justification for these “hired positions” are provided in the Direct Testimony of Garry
10 Hofer at Attachment B.

11
12 Q15. Please outline the staffing level for Test Year 2024 as requested in this Application.

13 A15. Staffing levels for the test year 2024 are based on the current staffing level plus the
14 “future hire positions” identified in Section VII and Attachment A to Mr. Hofer’s
15 testimony. These “future hire positions” can be grouped into two categories. The first
16 category consists of 11 positions essential to support current California American Water
17 operations in the areas of environmental compliance, regulatory compliance, and the day-
18 to-day work of ensuring that the Company’s systems are maintained and running
19 smoothly. The second category consists of four positions that will serve in connection
20 with the pending acquisitions of the Warring and Bass Lake water systems. Detailed
21 support and justification for these “future hire positions” are provided in Attachment A to
22 the Direct Testimony of Garry Hofer. Table A below provides an overview of current
23 staffing and proposed staffing for Test Year 2024.

Table A

California American Water Current and Proposed Staffing

	Column (A)	Column (B)	Column (C)	Column (D)	Column (E)
Cost Center	2022 Current Staffing	New Hire Positions (CAW)	TY 2024 Staffing (CAW Needs)	New Hire Positions (Acquisitions)	TY 2024 Staffing (Total Needs)
California Corporate	84	9	93		93
Northern Division	72	1	73	3	76
Central Division	80		80		80
Central Division WW	11		11		11
Southern Division	76	1	77	1	78
Total California	323	11	334	4	338

Q16. How are total wages forecasted for test year 2024?

A16. Employee payroll for 2024 is calculated by indexing the 2022 payroll by the union contract agreement rate, which ranges from 2.5% to 3.00% depending on the district in 2023 and 2024 for union employees, and 3.3% in 2023 and 3.4% in 2024 for non-union hourly employees and exempt employees. The union contract agreement rate for union employees is based on the latest bargaining agreement in all years of the forecast. At the time of the Application filing, California American Water management is in the process of negotiating a new bargaining agreement. Impacts of any updated bargaining agreement ratified will be incorporated into the 100-day update, if possible. The requested 15 new positions are then added to that result to arrive at total wages forecast for 2024. The wage increase differential for non-union hourly and exempt employees is based on merit increases to keep wages in line with the overall utility sector. These forecasted wage increases are guided by survey information from Willis Towers Watson.

1 Q17. Are there any other issues you would like to address before moving on to other
2 components of labor?

3 A17. Yes, I'd like to address the four positions requested related to the acquisitions of Bass
4 Lake Water Company (3) and Warring Water Company (1). Mr. Hofer's testimony at
5 Sections VII and VIII addresses the operational need for these positions, so I will not
6 belabor that point. I do, however, want to emphasize that these positions are current (i.e.
7 pre-acquisition) positions of Bass Lake and Warring respectively. Thus, the costs of these
8 positions are covered in the existing revenue requirement of those utilities. Bass Lake and
9 Warring are Commission regulated water utilities that have their revenue requirement
10 reviewed and authorized through Commission proceedings. These authorized revenues,
11 and thus the associated rates, were based in part on inclusion of labor expenses the
12 Commission deemed necessary to operate these systems. The positions being integrated
13 into California American Water's workforce as part of these acquisitions are still
14 necessary to operate the systems. Further, the expense for these positions will be offset in
15 part by the revenues generated by the acquisition related customers. Thus, it is important
16 to emphasize that while these are "new hire positions" for California American Water,
17 they are not new positions for Bass Lake and Warring. They are positions the
18 Commission previously approved rate recovery for and that California American Water
19 requests continued funding for in the future.

20
21 Q18. How are other components of labor forecasted?

22 A18. Overtime is calculated by using a three-year average based on the recorded overtime and
23 hours by eligible employee position from 2019-2021. Similarly, standby labor expense is
24 calculated based on the three-year average of these charges from 2019-2021. Although
25 not included in the staffing breakdown provided above, California American Water has
26 included funding of three intern positions, two part time and one full time, in the
27 forecasted 2024 revenue requirement. California American Water has historically
28 employed interns to great success. In addition to performing work important to the

1 Company, the positions provide the interns with opportunities to gain real-world
2 knowledge and experience. Additionally, past interns have been kept on in full time roles
3 thus ensuring continued knowledge retention.
4

5 Q19. How is total compensation forecasted?

6 A19. As discussed in Mr. Hofer's Direct Testimony, Section VII, California American Water's
7 total compensation includes performance, which pay may be awarded under two plans –
8 the Annual Performance Plan ("APP") and the Long-Term Performance Plan ("LTPP").
9 All full-time employees participate in the APP. Eligibility for the LTPP is limited to
10 certain exempt employees. The reasonableness of the total compensation, including the
11 APP/LTPP plans is discussed in Mr. Hofer's testimony at Section VII.
12

13 Q20. How are salaries and payroll allocated to operating districts?

14 A20. Salaries and payroll for personnel assigned directly to specific service districts is charged
15 to that service district. Salaries and payroll for general office employees providing
16 statewide functions are included in Corporate General Office and then allocated to
17 service district based on customer count.
18

19 Q21. Please provide an overview of the capitalization rates used in the model.

20 A21. Capitalization rates are based upon a three-year average from 2019-2021. The three-year
21 average provides a reasonable expectation of costs since overall staffing has been fairly
22 consistent over this period. These capitalization rates are used to allocate total
23 compensation between expensed and capitalized salaries and payroll costs.
24

25 **V. OPERATIONS AND MAINTENANCE EXPENSE**

26 Q22. Please explain how cost projections for operations and maintenance ("O&M") expense
27 were developed.
28

A22. The methodology used to forecast O&M expense are described by account below. In all but a few exceptions, costs were projected based on a 5-year historical average, and escalated for inflation; however, deviations from this methodology are described below and presented in the workpapers supporting the Report on the Results of Operations. Unless otherwise noted, all inflation and escalation rates utilized in modeling were based upon the California Public Advocates Office (“Cal Advocates”) monthly Escalation Memorandum as of March 2022.

A. Source of Supply Expenses

Q23. Please describe the forecast methodology for Source of Supply Expense.

A23. Source of supply expenses are included in our RO model and cover Uniform System of Accounts (“USOA”) account numbers 703 and 704 as follows:

- Account 703 – Source of Supply – Miscellaneous
- Account 704 – Purchased Water
- Account 709 – Source of Supply – Maintenance

My testimony addresses expenses associated with Account 703 – Source of Supply – Miscellaneous and Account 704 – Source of Supply – Maintenance. Purchased Water expense (Account 704) is addressed in Section V of the testimony of Bahman Pourtaherian. Source of Supply – Miscellaneous and Maintenance expenses include those costs incurred in the operation of source of supply facilities including, but not limited to, supplies and supply mains, removing sediment and organic growth, patrolling and inspection, compilation of records and reports including water level reports.

California American Water uses an inflation adjusted 5-year average to estimate the test year 2024 Source of Supply – Miscellaneous and Maintenance expenses. There are no deviations from the standard methodology for Accounts 703 and 709.

B. Pumping Expenses

Q24. Please describe the forecasting methodology for pumping expenses.

A24. Pumping expenses are included in the RO model and cover USOA account numbers as follows:

- Account 725 – Pumping – Miscellaneous
- Account 726 – Fuel or Power Purchased for Pumping
- Account 730 – Pumping – Structures & Improvements
- Account 731 – Pumping – Power Production Equipment
- Account 733 – Pumping – Equipment

My testimony addresses all of our pumping expenses with the exception of USOA account 726 on purchased power that is addressed in the testimony of Bahman Pourtaherian at Section V. The USOA descriptions are included above. Pumping expenses include non-labor costs incurred in the operation of pumping equipment including operating pumps, oiling, testing, checking and adjusting meters and gauges, cleaning pumps and motors, supplies as lubricants, fuses, waste, gaskets, and charts.

California American Water uses an inflation adjusted 5-year average to estimate the test year 2024 source of supply expense for Accounts 725, 730, 731, and 733. There are no deviations from the standard methodology for these Accounts.

C. Water Treatment Expenses

Q25. Please describe the forecasting methodology for water treatment expenses.

A25. Water treatment expenses are included in the RO model and cover USOA account numbers as follows:

- Account 742 – Water Treatment – Operational

- Account 743 – Water Treatment – Miscellaneous
- Account 744 – Water Treatment – Chemicals
- Account 748 – Water Treatment – Maintenance

My testimony addresses all of our water treatment costs with the exception of USOA account 744 on chemicals that are addressed in Section V of the testimony of Bahman Pourtaherian. Water treatment expenses include the cost of operating water treatment plants, chlorination equipment, water sampling at wells, certain laboratory expenses not included in costs from American Water Shared Services Company (“AWSSC”), and other miscellaneous treatment costs.

California American Water uses an inflation adjusted 5-year average to estimate the test year 2024 water treatment costs. The only deviation from this standard methodology relates to Account 748 – Water Treatment – Miscellaneous. As addressed in Section III.C of the Testimony of Garry Hofer, in 2022 California American Water will begin incurring additional expense of \$144K per year related to ongoing replacement of carbon filter media at new treatment facilities in the Baldwin Hills system.¹ These costs are included in forecasted expenses beginning in 2022 and escalated to 2024 using the standard escalation factors.

D. Transmission & Distribution (USOA Account Nos: 752—766)

Q26. Please describe the forecasting methodology for Transmission & Distribution (USOA Account Nos. 752-766).

¹ On June 16, 2021, California American Water filed Advice Letter 1338 requesting authority to establish the Central Basin Contamination Memorandum Account to track costs associated with replacing the Granulated Activated Carbon (“GAC”) filter media for water treatment at two well sites in its Baldwin Hills service area in the Los Angeles District. This memo account was approved effective July 16, 2021.

A26. Transmission and distribution (“T&D”) costs are reflected in USOA accounts 752 through 766 as following:

- Account 752 – T&D – Storage Facilities
- Account 753 – T&D – Lines
- Account 754 – T&D – Meters
- Account 755 – T&D – Customer Installations
- Account 756 – T&D – Miscellaneous
- Account 761 – T&D – Maintenance of Mains
- Account 763 – T&D – Maintenance of Services
- Account 764 – T&D – Maintenance of Meters
- Account 765 – T&D – Maintenance of Hydrants
- Account 766 – T&D - Maintenance of Misc. Plant

T&D costs include supervision and engineering, flushing, transmission and distribution lines, turn-on and turn-off services, installation, and miscellaneous expenses. California American Water uses an inflation adjusted 5-year average to estimate the test year 2024 T&D costs. The only deviations from the standard methodology for T&D are costs related to costs for compliance with Water Loss Performance Standards, Geographic Information System (“GIS”) expenses, and Comprehensive Planning Study (“CPS”) expenses, tank maintenance expenses, and State Water Resources Control Board Division of Drinking Water Fees.

Q27. Please describe the deviation related to compliance with Water Loss Performance Standards.

A27. Water Loss Performance Standards, and associated costs, are described in Section X of the Direct Testimony of Patrick Pilz. As described in that testimony, the Program consists of capital costs and operating expenses. The forecasted operating expenses are included

1 in Account 752. Note that the full three-year program expense is amortized evenly over
2 the GRC period 2024-2026.

3
4 Q28. Please describe forecasts for GIS and CPS expenses.

5 A28. Forecasts for these expenses are described in Section XVI of the Direct Testimony of Ian
6 Crooks. A substantial portion of the three-year 2024-2026 CPS and GIS budget are
7 included in 2024. In order to smooth out the impact of this ongoing expense, I
8 recommend the three-year budget be amortized over the three years of the GRC cycle.
9 This amortization is reflected in the RO Model in Account 756 – T&D – Miscellaneous.

10
11 Q29. Please describe forecasts for tank maintenance expenses.

12 A29. Forecasts for these expenses, including proposed amortization periods, are described in
13 Section XVII of the Direct Testimony of Ian Crooks. These costs are reflected in the RO
14 Model in Account 766 – T&D – Maintenance of Miscellaneous Plant.

15
16 Q30. Please describe forecasts for the State Water Resources Control Board fee.

17 A30. On September 22, 2021, the State Water Resources Control Board (“State Water Board”)
18 adopted emergency regulations that adjusted drinking water fees to conform to the
19 revenue levels set forth in the Budget Act for fiscal year (“FY”) 2021-22. The proposed
20 emergency regulation will adjust the fee schedule adopted in FY 2019-20 to increase fees
21 approximately 26.6 percent on average for community water systems, including
22 California American Water.² The State Water Board issued a Notice of Proposed
23 Emergency Rulemaking on October 14, 2021. As cost increases were only fully reflected

24
25
26
27 ² On December 14, 2021, California American Water filed Advice Letter 1350 to request authority to
28 establish a Drinking Water Fees Expense Memorandum Account (“DWFMA”) to track increased
public water systems annual fees as charged to California American Water by the State Water Board.
This memo account was approved effective December 15, 2021.

in calendar year 2021, California American Water uses the 2021 recorded cost as a baseline, then escalates to 2024 using the standard escalation factors.

E. Customer Accounts (USOA Account Nos: 772—775)

Q31. Please describe the forecasting methodology for Customer Accounts (USOA Account Nos. 772-774).

A31. Customer accounts expense is reflected in USOA accounts 772 through 774 as following:

- Account 772 – Customer Accounts – Meter Reading
- Account 773 – Customer Accounts – Customer Records & Collection
- Account 774 – Customer Accounts – Miscellaneous
- Account 775 – Uncollectible Accounts

Customer Accounts includes costs incurred in work on customer application, contracts, orders, credit investigations, billing and accounting, collections, and complaints, as well as costs related to uncollectible accounts and leak adjustments.

California American Water uses an inflation adjusted 5-year average to estimate the test year 2024 Customer Accounts costs. The only deviation relates to Account 775 – Uncollectible Accounts.

Q32. Describe the deviations from the standard methodology for Account 775.

A32. There are two deviations for Account 775. The first relates to the forecast for uncollectible expense and the second relates to the forecasted leak adjustments included in revenue requirement.

Q33. Please describe the methodology used to forecast uncollectible expense.

1 A33. California American Water's typical methodology for forecasting test year uncollectible
2 expense is to use a 5-year average of the annual uncollectible rate. However, in response
3 to the COVID-19 pandemic, California American Water implemented a disconnection
4 moratorium in March of 2020.³ This resulted in a level of uncollectibles in 2020 and
5 2021 that is not representative of the Company's historical or projected activity. In light
6 of this impact, I recommend the use of the uncollectible rate of 0.5207% authorized in
7 California American Water's 2019 GRC as established in D.21-11-018. This level of
8 uncollectibles, which has undergone Commission review and approval, reflects
9 California American Water's anticipated going level of uncollectible expense. To
10 calculate uncollectible expense for 2024, the uncollectible rate is multiplied by forecasted
11 revenues.

12
13 Q34. Please describe the methodology used to forecast leak adjustments.

14 A34. Forecasted leak adjustments are based on a 5-year inflation adjusted average by service
15 area consistent with the standard forecasting methodology. California American Water
16 performs an annual review of leak adjustment activity by service area. A statistical
17 formula is used to determine the number of customer bills that need to be reviewed to
18 ensure conformance with the Company's leak adjustment policy and the highest dollar
19 adjustment bills are also included in this analysis. Each identified bill is reviewed and
20 validated.

21
22 **VI. ADMINISTRATIVE AND GENERAL EXPENSE**

23 Q35. Please explain the structure of California American Water's General Office costs.
24

25
26 ³The Commission ordered a moratorium on disconnections for unpaid bills incurred during the COVID-
27 19 emergency from March 2020 through February 1, 2022. The Direct Testimony of Patrick Pilz at
28 Section III discusses California American Water's compliance with the Commission's emergency
customer protections – including the disconnection moratorium – and our customer service efforts.
The Direct Testimony of Jeff Linam at Section IV discusses financial impacts resulting from the
COVID-19 emergency.

1 A35. General Office costs are comprised of two categories: Cal Corp and AWSSC. Cal Corp
2 costs are associated with the state corporate office and represent employees and costs
3 specific to California and, where applicable, Hawaii. Examples of this include the rates,
4 finance, external affairs, and water quality teams that serve multiple districts across
5 California, as well as lease costs for the state corporate office in San Diego County.
6 AWSSC costs are addressed by Company Witness John Watkins in Section II of his
7 Direct Testimony. Additionally, please reference the organization chart at Attachment D
8 to the Application.

9
10 Q36. Please explain how cost projections for administrative and general expense were
11 developed.

12 A36. The methodology used to forecast administrative and general expense are described by
13 account below. Generally, costs were projected based on a 5-year historical average, and
14 escalated for inflation; however, deviations from this methodology are described below
15 and presented in the workpapers supporting the Report on the Results of Operations.
16 Unless otherwise noted, all inflation rates utilized in modeling were based upon Cal
17 Advocate's monthly Escalation Memorandum as of March 2022.

18
19 **A. Administrative and General**

20 **1. Insurance Other Than Group (USOA Account Nos: 793-794)**

21 Q37. Please describe the forecasting methodology for Insurance Other Than Group (account
22 Nos. 793-794).

23 A37. This account includes the cost of insurance to protect the utility against losses and
24 damages to owned or leased property used in utility operations and the cost of insurance
25 to protect the utility against injuries and damages claims, losses of such character not
26 covered by insurance, and expenses incurred in settlement of injuries and damages
27 claims:
28

- Account 793 – Property Insurance (Non-Corporate Costs)
- Account 794 – Injuries and Damages

Q38. Please explain how Insurance Other Than Group (“IOTG”) expenses were developed.

A38. Historically, the IOTG expense included coverages for Property, Auto Liability, General Liability, Excess Liability, and Workers Compensation which comprise approximately 91.9% of the cost. The Company has other policy coverages such as Directors and Officers, Employment Practices, and Cyber Crime policies that comprise the remaining 8.1% of the cost. The calculation of the projected IOTG expense is based on starting with the most current actual premiums as of 1/1/2022 in the amount of \$3,107,573. These premiums were then increased for 2023 - 2026 based on information provided to the Company by our insurance brokers. It is based on current market conditions. Projected increases for 2023, 2024, 2025, and 2026 are 4.74%, 3.00%, 3.00%, and 3.00%, respectively. A portion of the Workers Compensation costs were capitalized based on the projected capitalization rates determined in the labor analysis workpapers.

Q39. In the 2019 GRC California American Water requested cost recovery for a proposed Earthquake Insurance policy in IOTG expense. Have you included a similar request in this Application?

A39. Yes, however we are not seeking cost recovery through forecasted IOTG expense. Instead, the Company is seeking cost recovery through the Catastrophic Event Memorandum Account (“CEMA”).

Q40. Please describe the need for the proposed Earthquake Insurance policy.

A40. California American Water operates within one of the most seismically active states in the United States of America. Potential damage to California American Water assets that do not reside on fee simple parcels or properties, such as distribution system mains, valves and hydrants are not covered by any of California American Water’s existing

insurance policies. In order to mitigate the risk associated with potential earthquake damage, the Company has identified a potential earthquake insurance policy that provides coverage for underground assets. The policy would provide \$10 million coverage for underground assets after the \$25 million deductible is reached. The premium is \$3.3 million for a one-year term.

Q41. Please describe the basis for cost recovery through the CEMA?

A41. California American Water recognizes the substantial cost related to the Earthquake Insurance policy. And while the Company believes these costs are justified to offset potential cost impact related to earthquake damage, the Company also seeks to mitigate the cost impact to rate payers. If this policy is approved as part of IOTG expense, the cost recovery would begin with test year 2024. However, I anticipate a Decision in this proceeding may be delayed beyond the start of the test year. If that occurs, the Company would not know whether the costs had been approved until sometime past the test year, and therefore would not have certainty to move forward with the purchase. In this scenario, customers would be funding a policy, at substantial cost, that had not yet been purchased. This situation can be avoided by booking to the CEMA for future cost recovery. Only costs actually incurred related to the policy would be booked, so there would be no recovery beyond what is actually spent.

Q42. Why is the CEMA an appropriate account to track these costs?

A42. The CEMA was established to recover the costs resulting from a catastrophic event declared a disaster or state of emergency. Costs booked to the account include those related to the restoration of service and facilities affected by catastrophic events. An earthquake powerful enough to cause damage triggering the proposed policy would likely be large enough to be considered a catastrophic event, so it makes sense that related costs would be included in the CEMA. Typically, the CEMA tracks costs after a catastrophic

event occurs; however, in this case, California American Water is simply requesting to track costs that will help mitigate impacts related to future catastrophic events.

2. Employees Pensions and Benefits (USOA Account No: 795)

- Account 795 – Employee Pension & Benefits (Non-Pension/Non-OPEB)

Q43. Please describe the forecasting methodology for Employee’s Pensions and Benefits.

A43. The forecasting methodology for both Pension and Other Post Employment Benefits (“OPEB”) expenses relied on Willis Towers Watson’s actuarial projection performed on behalf of all American Water. Using the projection, California American Water extracted its portion of the total expense by taking its percentage allocation against each year’s overall cost. The Company’s percentage was based on the current actual allocation received in 2022. For pension expense, this was 5.52% and for OPEB 3.59%.

As was approved in prior cases and continued in this case, California American Water pension expenses are based on ERISA cash funding amounts. However, I would like to highlight that under ASC 715, the Company can now only capitalize that portion of the pension and OPEB cost that relates to the Service Cost portion of the total cost. For pensions, the total cost is \$1,468,320 of which \$1,012,700 is Service Cost. The remaining \$455,620 is Non-Service Costs. For OPEB’s, the total cost is (\$871,482) of which \$107,183 is Service Cost. The remaining (\$978,665) is Non-Service Costs. The RO Model is capitalizing a portion of the Service Costs of both pensions and OPEBs and expensing the entire amount for the Non-Service Period Costs.

Q44. How are other employee benefits such as 401K expense, defined contribution plan expense, and employee stock purchase plan expenses forecasted?

1 A44. For current employees, these benefits are forecasted based on application of the labor
2 escalation factors. For new hire employees, these benefits are forecasted based on the
3 average employee benefit for similar positions.

4
5 Q45. Please explain how Group Insurance expenses were developed.

6 A45. To estimate group insurance, California American Water took information provided by
7 American Water, which was obtained from AON. Using the actual group insurance cost
8 data for 2011-2021 and (1) projecting cost increases for both medical/RX and
9 dental/vision, (2) no plan changes beyond 2021, and (3) Company / employee cost-
10 sharing as a percentage of premium, AON has projected the annual cost increases for
11 2023 - 2025 to be 5.54%, 5.05%, and 4.90% with the average being 5.22% for the three
12 year projection. These cost increases were applied to the actual group insurance
13 premiums in effect for 2023.

14
15 **3. Regulatory Expenses (USOA Account No: 797)**

- 16 • Account 797 – Regulatory Expense (Other Operating WT)

17
18 Q46. Please describe the forecasting methodology for regulatory expenses (account #797).

19 A46. This account includes all expenses incurred by the utility in connection with formal cases
20 before regulatory commission, or other regulatory bodies, or cases in which such a body
21 is a party. This includes, but is not limited to:

- 22
23 • Applications that California American Water files or participates in,
24 including rate cases, Orders Instituting Rulemaking (“OIRs”), Orders
25 Instituting Investigations (“OIIs”), acquisitions, and other special
26 applications.
27 • Advice letters that are the result of a decision, resolution, or some other
28 Commission directive.

- Monthly, quarterly, semi-annual, or annual compliance reports, such as the semi-annual filings of balancing accounts, the Commission annual reports, customer service statistics, and reporting required in general orders.
- Ad hoc requests for industry data, opinions on policy, workshops, etc.
- While California American Water attempts to satisfy many of these activities within its existing labor pool, it can occasionally incur costs from outside services to support or supplement its labor.

Q47. Which applications and proceedings has California American Water been involved in over the past three to five years?

A47. California American Water has been involved in over a dozen proceedings over the last five years. Some examples are the Monterey Peninsula Water Supply Project (“MPWSP”) (A.12-04-019); Monterey Conservation and Rate Design (A.15-07-019); California American Water’s 2016 GRC (A.16-07-002); 2017 Cost of Capital proceeding (A.17-04-003); OIR re Low-Income Rate Assistance Programs (R.17-06-024); Financing application (A.17-08-018); California American Water’s 2019 GRC (A.19-07-004); the Laguna Sec Moratorium (A.19-07-005); 2021 Cost of Capital proceeding (A.21-05-001); Pure Water Monterey Expansion (A.21-11-024); acquisitions of Fruitridge (A.17-10-016), Rio Plaza (A.17-12-006), Hillview (A.18-04-025), Bellflower (18-09-013); East Pasadena (A.20-04-003), Warring (A.20-04-017); and Bass Lake (A.22-03-002); and preparation for the 2022 GRC.

Each of the above proceedings can require extensive resources to address and may involve not only Cal Advocates, but other intervenors as well. By way of example, there were over 20 intervenors in A.12-04-019 regarding the MPWSP. The intervenors included environmental groups, local city, county, and other governmental agencies, consumer groups, and others. That proceeding lasted over six years, and the procedural history was so voluminous the Commission used a separate appendix to detail it in

1 connection with D.18-09-017. California American Water’s pending Pure Water
2 Monterey Expansion application (A.21-11-024) involves many of the same intervenors
3 involved in the MPWSP proceeding. Proceedings can also involve extensive discovery
4 and voluminous reports and testimony. For example, in California American Water’s
5 2019 GRC (A.19-07-004), the Company responded to approximately 976 data requests
6 and a combined total of 1,845 pages of direct testimony from Cal Advocates. That
7 proceeding also involved a number of intervenors, many of whom also provided
8 testimony. Even ostensibly routine matters, such as the acquisition of small water
9 systems, often take years to complete, and can involve extensive discovery, testimony,
10 hearings, and briefing. For example, California American Water’s unopposed application
11 requesting acquisition of Warring Water System (A.20-04-017), a system with 518
12 customers, was filed more than 2 years ago, and a proposed decision has not yet issued.
13 Our Fruitridge Vista acquisition (A.17-10-016) also took more than two years in which to
14 obtain a final decision. Our proposed Bellflower acquisition (A.18-09-013) was first
15 filed at the Commission in 2017 as an advice letter, and it has been before the
16 Commission since 2018 as an application. The docket in that proceeding spans more
17 than 100 entries, and, although a settlement of all issues was filed in late 2021, a
18 proposed decision in the matter has yet to issue.

19
20 Q48. What services does California American Water’s outside regulatory counsel provide?

21 A48. California American Water’s outside regulatory counsel is Nossaman LLP
22 (“Nossaman”). Nossaman provides advice and counsel on regulatory matters and appears
23 on behalf of California American Water in Commission proceedings. The regulatory
24 team at Nossaman has substantial Commission expertise, with a particular focus on water
25 utilities. Nossaman has extensive experience representing utilities and interested parties
26 in general rate cases, cost of capital proceedings, rulemakings, and other Commission
27 matters.
28

1 The services provided by Nossaman vary based on the particular project or matter. In
2 some matters, the role of outside counsel may be limited to review of documents, advice
3 on strategy, and targeted research requests. In other matters, which may be more complex
4 or require the resources of a law firm, outside counsel may take the lead, drafting
5 pleadings, conducting extensive research, and appearing before the Commission at
6 prehearing conferences and evidentiary hearings. In yet other matters, these tasks may be
7 traded off between outside counsel and California American Water's in-house legal team
8 based on resources and availability.
9

10 Q49. How did California American Water develop its regulatory expense estimate?

11 A49. Detailed calculations supporting these amounts are included in the RO Model
12 workpapers. California American Water based its estimates on historical costs and its
13 experience with regulatory proceedings. It is important to note that since payroll costs of
14 California American Water employees are requested as part of labor expense, they are
15 excluded in these estimates.
16

17 Q50. The Company is proposing to increase its regulatory expense expenditures from those last
18 authorized during the three-year rate cycle (2021-2023) by approximately \$1.9 million.
19 Please explain the reasons for the Company's increase in its request for regulatory
20 expenses.

21 A50. There are multiple drivers for the increase: (1) Printing/Noticing/Mailing (\$416,000), (2)
22 Acquisition Proceedings (\$1,463,000), and (3) Regulatory Consultants (\$531,000).
23

24 First, is the matter of increases in the cost for printing of regulatory proceedings materials
25 and the printing and mailing of customer notices associated with the rate case, other
26 proceedings, Tier 3 Advice Letters, the Cost of Capital Proceeding, and acquisition
27 proceedings. For example, the printing and noticing for customers for a GRC includes
28 the cost of mailings and newspaper notices for the filing, PPH's, evidentiary hearings,

1 and the final decision. The printing and noticing for customers for the Cost of Capital
2 Proceeding includes the cost of mailings and newspaper notices for the filing, PPH's, and
3 evidentiary hearings. The total projected cost for these two proceedings is \$964,000 or
4 55% of the total requested amount for noticing, printing and mailing costs for regulatory
5 proceedings. The printing and noticing costs for an acquisition filing similarly includes
6 the cost of mailings and newspaper notices for the filing, PPH's, and/or evidentiary
7 hearings. The Company estimates noticing costs of approximately \$180,000 per
8 acquisition, and as discussed further below, anticipates three acquisition filings in the
9 period 2024-2026. All of these projections are based on the projected costs for customer
10 mailings which include postage and materials and for the cost of newspaper notices.

11
12 Second is the increase for Acquisition Proceedings. The California Legislature, the
13 Commission, and the State Water Board have found that the consolidation of water
14 utilities is in the public interest. Commission regulated utilities require Commission
15 approval to acquire existing regulated water utilities. These approvals are typically
16 achieved through a formal application with the Commission. Each application requires an
17 independent appraisal of the system being acquired, which can necessitate substantial
18 costs in the cases of larger systems or those with water rights. With each acquisition, the
19 Company incurs travel expenses related to due diligence tours, field visits, Commission
20 tours, and the processing of the acquisition Application. Additionally, each acquisition
21 requires closing costs to fold the entity into California American Water's structure.
22 Finally, in some instances the acquisition approvals are complex enough to warrant
23 outside legal assistance in the processing of the Application with the Commission.

24
25 Historically, California American Water has requested a memo account within each
26 acquisition application to track costs specific to each acquisition. However, the
27 Commission has not provided consistent authorization for these individual memo
28 accounts to ensure the opportunity for cost recovery. With Special Request #8, described

1 in the Direct Testimony of Jeffrey Linam at Section IV, the Company requests a Utility
2 Transaction Cost Memorandum Account (“UTCMA”) to track transaction costs for all
3 future acquisitions. The need for the UTCMA is detailed in Mr. Linam’s testimony;
4 however, I note here that if that account is approved, then such transaction costs can be
5 removed from forecasted regulatory expenses.

6
7 And third is the increase for Rate Consultants. The increasing complexity of rate filings
8 necessitates increased use of outside consultants to prepare and execute such applications.
9 Outside consultants provide expertise and assistance in preparing the revenue
10 requirement model for the filing, and in preparing supporting testimony and exhibits.
11 Rate design consultants provide analysis and support complex sales forecasts, rate design
12 scenarios, and cost consolidation scenarios.

13
14 Q51. How did California American Water estimate rates for regulatory expenses for outside
15 counsel discussed above?

16 A51. California American Water’s estimate is based on hourly rates and forecasts of hours.
17 Hourly rates were based on the current discounted rates charged by Nossaman. The rates
18 were divided into four categories: (1) senior attorney, (2) mid-level attorney, (3) associate
19 attorney and (4) paralegal/practice support specialist. For senior attorney, midlevel
20 attorney, and paralegal/practice support specialist, an average of the rates of the specific
21 attorneys and professionals in those categories who may provide service to California
22 American Water were used. For the associate rate, the current rate for the main Nossaman
23 associate working on California American Water matters was used. To estimate future
24 rates, the 2022 rates were escalated annually based on input from outside counsel.

25
26 To develop the forecast of hours by category, California American Water examined the
27 data for the most recent general rate case and cost of capital proceedings. California
28 American Water also reviewed the data for non-GRC, non-cost of capital proceedings.

California American Water looked at the hours spent by each type of attorney or professional in those proceedings, and it used that as the basis for forecasting hours by attorney category and professionals in future proceedings.

Q52. Please explain the proposed recovery of regulatory expenses.

A52. California American Water is seeking to recover regulatory expense over three years consistent with D.12-06-016. However, instead of being amortized over 36 months, California American Water requests that the authorized level of expense be factored into the revenue requirement over 27 months. The recovery is proposed to be authorized for 3 months of the Test Year starting October 1, 2024, with the remaining amount recovered equally in the escalation and attrition years. For further details, please reference the testimony of Mr. Jeffrey Linam, Section IV (Special Request #11).

4. Other A&G (USOA Account Nos: 792—805)

- Account 792 – Office Supplies and Other Expenses
- Account 798 – Outside Services
- Account 799 – Miscellaneous General Expenses
- Account 805 – Maintenance of General Plant

Q53. Please describe the forecast methodology for Other A&G.

A53. California American Water uses an inflation adjusted 5-year average to estimate the test year 2024 Other A&G expenses, with the exception of the deviations detailed below.

Q54. Describe the deviations from the standard methodology.

A54. There are multiple deviations as described below.

Q55. Please describe the deviation related to funding of the customer portion of the Hardship Benefit Program.

1 A55. The Hardship Benefit Program is described in Section VII of the Direct Testimony of
2 Patrick Pilz. As described in that testimony, the Program is proposed to be funded
3 partially by customers and partially by the Company. The customer funded portion is
4 included in Account 792. Note that the full three-year program expense is amortized
5 evenly over the GRC period 2024-2026.

6
7 Q56. Please describe the deviation related to California American Water's Conservation
8 Program.

9 A56. California American Water's Conservation Program, and associated costs, are described
10 in Section VIII of the Direct Testimony of Patrick Pilz. The forecasted operating
11 expenses are included in Account 799. Note that the full three-year program expense is
12 amortized evenly over the GRC period 2024-2026.

13
14 Q57. Please describe the deviation related to transportation expenses.

15 A57. Transportation costs, including fuel, lease, and maintenance expenses, are described in
16 Section III of the Direct Testimony of Edward Simon. The forecasted operating expenses
17 are included in Account 799.

18
19 Q58. Please describe the deviation related to meals and employee expenses.

20 A58. These include costs related to employee meals, travel, lodging, airfare, etc. The
21 forecasted expenses are included in Account 799. The standard methodology based on a
22 5-year average does not provide an accurate representation of future expenses as the
23 baseline includes the COVID pandemic years of 2020 and 2021. Related expenses were
24 substantially limited as employees limited, or in most cases entirely eliminated, travel,
25 meals, lodging, airfare, and other similar expenses. In order to accurately forecast these
26 expenses, the Company has utilized a three-year average of expense that excludes 2020,
27 and 2021 as they are not representative of projected activity.

1 Q59. What is the final deviation?

2 A59. The final deviation is due to the acquisitions of Bellflower, Warring, and Bass Lake.
3 These systems will require continued use of existing contracted services to address
4 ongoing system needs. Contract services have historically included such expenses as
5 radio service, water testing, trash services, association dues, and miscellaneous services
6 such as metering support, and temporary labor. These are forecasted based on historical
7 expenses and inflated to 2024 dollars. These acquisitions will also require additional
8 miscellaneous operations and maintenance expenses outside of regular production
9 expenses. These forecasts are based on historical miscellaneous O&M costs (such as
10 maintenance, customer accounting, and other miscellaneous operating expenses) for these
11 systems. Additionally, these acquisitions will require additional incremental IOTG
12 expense. Cumulatively, these acquisitions will require additional incremental expenses of
13 approximately \$476,000 for the Bellflower system, \$180,000 for the Warring system, and
14 \$405,000 for Bass Lake.

15
16 **5. Rents (USOA Account No: 811)**

17 Q60. Please describe the forecast methodology for Account 811 – Rents.

18 A60. Rent expense is based on the standard five-year average methodology except for the
19 following deviations. Lease costs per the executed lease agreements are used for the
20 corporate office at 655 W. Broadway, San Diego; the legal office at 555 Montgomery
21 Street, San Francisco; the operations center at 1025 Palm Avenue, Imperial Beach CA;
22 the Hillview operations office at 40321 Greenwood Way, Oakhurst CA; and the rates
23 office at 520 Capitol Mall, Sacramento CA. All lease agreements, except for the rates
24 office at 520 Capitol Mall, Sacramento CA, are consistent with expenses included in the
25 last General Rate Case.

26
27 Q61. Please describe the lease for 520 Capitol Mall.
28

1 A61. In early 2022 California American Water executed a lease agreement for 3,970 square
2 feet of office space at 520 Capitol Mall, Sacramento CA. As addressed in Section X of
3 my testimony below, this space relates to the California American Water Corporate
4 Headquarters Transition. The lease commenced in 2022 and included a 6-year, 3.5-month
5 term.

6
7 **VII. MDR CONTENT AND REFERENCING**

8 Q62. Please explain the layout of the MDRs as it relates to operating expenses.

9 A62. In accordance with the RCP in D.04-06-018 and D.07-05-062, California American
10 Water has included its RO as part of the MDR requirements. The following information
11 on O&M, A&G, and General Office expenses can be found in Section B of the MDR.
12 Section B has also been cross referenced to the pertinent parts of my testimony.

- 13
14 (i) Five years of historical data (2017-2021)
15 (ii) Estimated and proposed costs (2024)
16 (iii) The change in costs per customer across historical, proposed, and last
17 adopted data. California American Water's last adopted test year for
18 expenses was 2021
19 (iv) The change in total payroll expense per thousand customers
20 (v) Changes in the number of employees in supervisorial, management, and
21 executive roles
22 (vi) The basis of general office cost allocation to the districts
23

24 **VIII. REGULATORY COMPLIANCE**

25 Q63. What is the purpose of your testimony regarding compliance?

26 A63. The purpose of my testimony is to discuss and support various aspects of California
27 American Water's attention to, process for, performance on, and furtherance of
28

1 compliance with Commission Orders, Rules, and requirements as part of this 2022
2 statewide GRC.

3
4 Q64. Generally, how does California American Water approach compliance with Commission
5 Orders, Rules, and requirements?

6 A64. California American Water takes compliance seriously as evidenced by the number of
7 safeguards it has implemented to ensure that all requirements are met in a timely and
8 responsive manner. Compliance is a necessity to ensure that service is provided to
9 customers in the most safe and efficient manner, and that the Commission is fully
10 informed as to the actions and results of all required compliance items.

11
12 Q65. What is the regulatory compliance process at California American Water?

13 A65. The process of regulatory compliance is as follows: (a) record compliance action items
14 issued in regulatory decisions, (b) assign and communicate compliance items to affected
15 parties, (c) monitor and track status of compliance items, and (d) report on status of
16 compliance items to the Commission.

17
18 ***Record compliance action items issued in regulatory decisions.*** The regulatory
19 compliance process is triggered by a Commission decision, resolution, or ruling. The
20 compliance item is recorded into a database housed in Microsoft SharePoint.

21
22 ***Assign and communicate compliance items to affected parties.*** Relevant parties are
23 assigned compliance items, upon which an automatic notification is sent via
24 SharePoint. Parties are responsible for entering status updates for each assigned item by
25 the assigned deadline.

Monitor and track status of compliance items. Items are monitored regularly (at a minimum, annually) as they become due. Items with discrete deadlines, or non-recurring items, are marked as expired once reported as complete before the Commission.

Report on status of compliance items to the Commission. A comprehensive list of current items is compiled and submitted to the Commission as a part of the rate case. Note that if non-recurring items were marked as completed in the prior rate case (A.19-07-005), they will have expired prior to this filing, and as such, are no longer reported as a compliance item.

Q66. If California American Water understands that it might be late with a compliance item for good cause, what does it do to notify the Commission?

A66. In compliance with the Rules of Practice and Procedure, if California American Water believes that it will be late in delivery, or simply cannot deliver for good cause, it follows applicable Commission procedures and seeks authorization of a delay or waiver in the requirement from the Executive Director, the assigned Administrative Law Judge, or Water Division.

Q67. Please explain more fully California American Water's protocol in relation to items requiring compliance actions?

A67. All proceedings are assigned to functional staff members, primarily in the Rates Department, who represent the Company throughout the proceeding and monitor developments, such as the issuance of rulings, reports, or proposed decisions. In addition, all items that appear on the Commission's Business Meeting Agenda are monitored by the Legal Department prior to the regularly scheduled Commission meeting and a dedicated staff member is present at those meetings to witness the voting on Company-specific items.

1 At the time the Commission issues a final decision or resolution, the Legal Department
2 summarizes Commission actions and disseminates the decision or resolution. Next, the
3 project manager interprets the decision and records compliance items as appropriate. The
4 recorded items are assigned to functional leads (e.g. Engineering, Operations, Water
5 Quality, etc.) and eventually to task owners who will manage the completion of the
6 compliance item. Task owners identify necessary sub-tasks, coordinate with team
7 members, and ensure project plans and timelines are met. Task owners report on their
8 progress and complete their items as they proceed through the process.

9
10 On a regular basis, the Rates Department guides a company-wide review of the collective
11 progress made on completing compliance items. Any additional required follow-up to
12 compliance actions are elevated at the meeting and monitored by the Rates Department
13 on a forward-going basis.

14
15 Q68. Has California American Water performed a recent thorough review of all compliance
16 items?

17 A68. Yes, California American Water has undergone a recent comprehensive review of all
18 compliance items, including fully documenting the results and actions taken to ensure all
19 historical compliance items have been addressed. It also discussed other actions that
20 might be appropriate to monitor these items on an ongoing basis. All items and the
21 Company's actions relative to compliance are provided in Attachment 1 to my testimony.
22 It should be noted that more and more compliance items are added as a result of decisions
23 each and every year. Since many compliance items are continuing in nature, the
24 continual addition of more compliance items adds to the burden of compliance oversight.
25 As California American Water takes compliance very seriously, the additional workload
26 must be considered in all applications as a need that simply has to be met.

IX. CHEMICAL COST BALANCING ACCOUNT – SPECIAL REQUEST No. 13

Q69. Describe the proposed chemical cost balancing account.

A69. California American Water proposes that the Commission authorize it to establish a balancing account for chemical costs that is based on changes in the actual amount incurred by the Company.

Q70. Why should the Commission authorize the proposed balancing account?

A70. There are several reasons that support approval of the balancing account. First, as shown in the table below, California American Water has experienced significant price increases when comparing current contract prices in 2022 to those in 2021:

Chemical Family	Growth in Price 2021 to 2022
Caustic Soda	20%
Chemicals - Other	30%
Ferric Chloride	83%
HFS (Fluoride)	7%
Phosphates	51%
Polymers	32%
Sodium Hypochlorite	11%
Total	19%

California American Water’s supply chain partners are regularly informed by suppliers that the chemical industry is experiencing unprecedented supply disruptions and cost increases, prior bids cannot be honored without the risk of product being supplied at a loss, and that the Company should expect rates to increase throughout 2022.

Many reasons have been provided by suppliers to explain the rising costs of chemicals, including but not limited to, post-COVID-19 global demand increases, chemical plant production outages due to harsh weather conditions and unanticipated plant shutdowns for maintenance, port back-ups and delays, large increases in ocean freight costs, a

1 shortage of qualified CDL drivers willing to transport government-regulated chemicals,
2 increased costs and lack of availability of common carriers, the recent hostilities in
3 Ukraine and the sanctions by the world community placed on Russian exports of all types
4 (including most importantly crude oil, which is a foundation of most polymer raw
5 materials and diesel fuel), and the announcement of China (the world's largest producer
6 of phosphate chemistries) it is ending exports of phosphate products until later this year.

7
8 California American Water is also impacted by the extreme volatility in the chemicals
9 market. As a result of this volatility, long-term agreements on chemical pricing are
10 becoming exceedingly difficult to obtain. Generally, in order to obtain the best available
11 pricing, the Company participates in American Water's system-wide competitive bidding
12 process and enters into unit-price contracts with the successful bidders for the chemicals
13 needed at its water and wastewater treatment facilities throughout California. Due to
14 current volatility in the market for chemicals, many vendors are no longer willing to offer
15 annual fixed-price contracts and have moved to quarterly or semi-annual contracts,
16 making the Company more susceptible to price fluctuations for necessary chemicals.

17
18 With all the expected changes in chemical prices and the expected current increases in
19 costs, the Company must be given the opportunity to ensure that neither customers (if
20 pricing decreases) nor California American Water (if prices continue to outstrip inflation)
21 are treated unfairly. It will be very difficult to accurately project a reasonable level of
22 chemical expense in this case. A balancing account, therefore, will be fair to all
23 concerned.

24
25 Q71. What is the Commission's criteria for establishing balancing accounts?

26 A71. The Commission's criteria are set forth in Standard Practice U-27-W. In D.20-09-019 the
27 Commission stated that although the Standard Practice refers specifically to
28

memorandum accounts, it is equally applicable to balancing accounts. Balancing accounts are appropriate when the following conditions are met:

- (1) The expense is caused by an event of an exceptional nature that is not under the utility's control;
- (2) The expense cannot have been reasonably foreseen in the utility's last GRC and will occur before the utility's next scheduled rate case;
- (3) The expense is of a substantial nature in the amount of money involved; and
- (4) The customers will benefit by the memorandum account treatment.

Q72. Does California American Water's proposed chemical cost balancing account meet the criteria?

A72. Yes. As discussed above, the dramatic increase in chemical costs has been caused by a combination of bad weather, COVID pandemic delays, the economic fallout of COVID impacts to production and transportation, and oil and fuel price increases, all of which are outside the control of California American Water. Chemicals are a required component in water treatment. Without use of specific chemicals, California American Water would not be able to provide safe water service as required by governmental regulations. These regulations and requirements preclude the Company from changing the suite of chemicals used in the Company's water treatment process based on price or supply pressure without making additional investments to change its operations, or risk noncompliance. When California American Water filed its last rate case in July 2019, no one could have anticipated the events of the past several years. The expense is also of a substantial nature. Forecasted chemical expense is anticipated to exceed \$2M per year by 2024.

Q73. Will California American Water still have an incentive to control chemical costs if the balancing account is approved?

1 A73. Absolutely. California American Water strives to provide least cost water to customers.
2 To this end, the Company coordinates with AWSSC, which has a center-led Supply
3 Chain Department to handle, among other responsibilities, contract negotiations, pricing,
4 and purchasing of the chemical needs. Annually, Supply Chain collaborates with the
5 California American Water operations teams to determine chemical needs prior to the
6 annual chemical bid event. This collaboration includes an understanding of any new
7 chemical requirements; any changes to treatment plant processes or equipment that would
8 impact chemical specifications or change the frequency and timing of orders from
9 historical levels, and any new facilities planned that will require chemicals to be bid
10 along with the quantities and specifications required.

11
12 Supply Chain conducts an annual nationwide sourcing event for all chemicals enterprise-
13 wide (including California American Water), working with 90 to 100 chemical suppliers
14 during the bidding process. New suppliers are certified and added to the bidding process
15 each year. In late August to early September, Supply Chain releases the bid requirements
16 (quantity and location) to certified suppliers, with the request for the suppliers to offer
17 firm, fixed prices for the upcoming year. These prices are all-in, delivered prices. All
18 bids are typically received within 4-to-5 weeks, at which point Supply Chain reviews the
19 responses to assess reasonableness of the bid based on location, needs, and requirements.
20 The goal is to determine the most ideal bid based on the best value for the specific state,
21 plant, and chemical.

22
23 The bid recommendations are provided to the California American Water operations
24 teams, for assessment of financial impacts and operational alignment. Once the bids are
25 finalized and accepted, Supply Chain works with the suppliers to amend contracts,
26 quantities, and pricing terms.

**X. CALIFORNIA AMERICAN WATER CORPORATE HEADQUARTERS
TRANSITION**

Q74. Can you describe the ongoing plan to relocate California American Water’s corporate headquarters?

A74. Yes, I can. The plan to relocate the corporate headquarters from San Diego to the greater Sacramento area was first raised in California American Water’s 2019 GRC Application 19-07-004. As described in that proceeding, the Sacramento area is California American Water’s largest service area and has the greatest potential for higher growth than any of the other service areas. This coupled with the fact that it is the Capitol and host to many of the Company’s regulators (even the Commission’s presence in Sacramento has increased over the last several year) drives the relocation. At the time the 2019 GRC was filed, the relocation of the corporate headquarters was anticipated to occur in 2024. However, this relocation has been delayed to the year 2030 or sooner.

If California American Water moves its headquarters, it must be considered that the San Diego Corporate HQ office lease expires in February 2025, which means plans to relocate must begin well before this date to ensure a smooth and efficient transition for both our employees and the business. If needed, California American Water will extend the San Diego lease on a short-term basis until the transition to Sacramento is complete.

The Company also plans to relocate the Sacramento Operations Center (“Sacramento OC”) together with the Corporate HQ to a new unified professional office and operations campus (“Consolidated Campus”). The current Sacramento OC at 4701 Beloit Drive does not meet the needs of Company going forward for various reasons including, but not limited to, capacity constraints, parking, location, employee security and safety, building conditions, and environmental health.

1 Q75. What is California American Water's plan for the interim period prior to the full
2 relocation?

3 A75. As described in Section VI of my Testimony above, in early 2022 California American
4 Water executed a lease agreement for 3,970 square feet of office space at 520 Capitol
5 Mall in Sacramento. This 6-year, 3.5-month lease commenced in early 2022. In the near
6 term, this space will be occupied by members of the Company's Rates and External
7 Affairs departments. This new office space serves multiple purposes. First, it will help
8 partially alleviate space constraints at the Sacramento OC as all employees relocating to
9 the Capital Mall office came from the OC. This provides additional space at the OC for
10 current and future employees. Second, it provides the Company a presence near critical
11 regulators and legislators. The space is located between the California Capitol Building
12 and the Commission's Sacramento office and is blocks away from the headquarters of
13 both the State Water Board and the California Environmental Protection Agency. Finally,
14 the space will help ease the headquarters relocation effort as it provides additional interim
15 space in the Sacramento area for both relocating and new Company employees to occupy.

16
17 The potential to lease additional interim space in the Sacramento region was addressed in
18 the 2019 GRC. In the adopted settlement resolving that proceeding, parties removed lease
19 expense from the forecasted revenue requirement, but parties to the settlement agreed to
20 include such expenses, if such are incurred, in a future General Rate Case.⁴ California
21 American Water has included the 520 Capitol Mall lease expense in forecasted revenue
22 requirement in compliance with the authorized settlement.

23
24 Q76. What is the next step in the relocation plan?

25 A76. As discussed in Section XV of the Direct Testimony of Ian Crooks, the Company plans to
26 engage the services of CBRE Group, Inc. to conduct a detailed transition and relocation
27 review. Subsequently, later in 2024 through 2025, California American Water will begin

28 ⁴ D.21-11-018, Appendix B, Section 5.4, pg 19

1 to investigate the developable land identified and is targeting to purchase the land in
2 2025. California American Water has included approximately \$3,000,000 in this rate
3 case filing to acquire land. Subsequently, in 2026-2027 the Company will begin planning,
4 design, and permitting efforts for the new Consolidated Campus. This will be followed
5 by construction and relocation activities in 2028-2030. These costs will be addressed in a
6 subsequent GRC.

7
8 **XI. RATEMAKING INTEGRATION OF ACQUISITIONS**

9 Q77. The operational integration of four acquisitions either recently approved or pending
10 CPUC approval are discussed in Section VIII of the Direct Testimony of Garry Hofer.
11 Mr. Hofer describes customer benefits from acquisitions generally and outlines
12 operational integration of the four acquisitions specifically. Can you discuss the proposed
13 ratemaking integration of these four acquisitions?

14 A77. Yes, I can. The status of the applications for Commission approval of the acquisitions are
15 as follows:

16
17 Bellflower: A.18-09-013, filed on September 14, 2018, seeks a Commission order
18 authorizing California American Water to purchase Bellflower Municipal Water
19 System's ("Bellflower Municipal") assets. Bellflower Municipal serves approximately
20 1,827 customers in the City of Bellflower. On November 23, 2021, California American
21 Water and Cal Advocates submitted a Joint Motion for Adoption of a Settlement
22 Agreement ("Bellflower Settlement"). If adopted, the Bellflower Settlement would
23 resolve all issues in the proceeding and authorize California American Water to acquire
24 the Bellflower system's assets. The assigned Administrative Law Judge in A.18-09-013
25 issued two information requests to that proceeding's parties concerning the Bellflower
26 Settlement. Parties answered those requests and now await a proposed decision on the
27 Bellflower Settlement and resolution of the entire proceeding.
28

1 Upon approval of the acquisition, Bellflower Municipal's assets are expected to be
2 consolidated with California American Water's Los Angeles District for operational
3 purposes and the Duarte sub-system of the Los Angeles District for ratemaking purposes.
4 Operational consolidation of Bellflower Municipal's assets is discussed in Section VIII of
5 the Testimony of Garry Hofer.

6
7 East Pasadena: A.20-04-003 was filed on April 6, 2020. It asked the Commission for an
8 order authorizing California American Water to purchase East Pasadena Water
9 Company's assets. East Pasadena was a Commission-regulated Class B public water
10 utility serving approximately 3,000 customers in the Cities of Temple City, Arcadia, and
11 San Gabriel, as well as an unincorporated portion of Los Angeles County south-east of
12 the City of Pasadena. The Commission approved the sale in D.21-08-002, issued on
13 August 6, 2021. D.21-08-002 authorized the immediate consolidation of the East
14 Pasadena service area into California American Water's Los Angeles County District and
15 deferred long-term ratemaking decisions to this proceeding. Operational consolidation of
16 East Pasadena is discussed in Section III.C.2. of the Testimony of Garry Hofer.

17
18 Warring: A.20-04-017 was filed on April 27, 2020, for an order authorizing California
19 American Water to purchase Warring Water Company's assets. Warring is a
20 Commission-regulated class D water utility. It serves approximately 518 customers in
21 and near Piru, Ventura County, California. No testimony was filed in opposition to this
22 proceeding and the parties to the proceeding now await a proposed decision. Upon
23 approval of the acquisition, Warring is expected to be consolidated with California
24 American Water's Ventura District for operational purposes, and the Los Angeles District
25 for ratemaking purposes. Operational consolidation of Warring is discussed in Section
26 VIII of the Testimony of Garry Hofer.

1 Bass Lake: A.22-03-002, filed March 1, 2022, requests Commission authorization for
2 California American Water to purchase Bass Lake Water Company's assets. Bass Lake
3 is a Commission-regulated Class C water utility. It serves approximately 1,000
4 customers near Oakhurst in Madera County, and it is located near California American
5 Water's recently acquired Hillview service area. A prehearing conference was held June
6 3, 2022. Upon approval of the acquisition, Bass Lake is expected to be consolidated with
7 California American Water's Northern Division for operational purposes and the
8 Sacramento District for ratemaking purposes. Operational consolidation of Bass Lake is
9 discussed in Section VIII of the Testimony of Garry Hofer.

10
11 Q78. Is there anything you would like to address before describing the ratemaking integration
12 of these acquisitions?

13 A78. Yes, I want to emphasize that California American Water is not seeking approval for
14 these acquisitions in this GRC Application. Authority to acquire those systems is sought
15 in the various acquisition proceedings discussed above for which the Commission has not
16 yet issued a final decision. The discussion below assumes the Commission approves the
17 still-pending acquisitions applications. Based on that assumption, the discussion outlines
18 a proposed integration for ratemaking purposes for each acquisition.

19
20 The total rate base determination addressed below is consistent with the rate base
21 determination requested in each proceeding. California American Water must propose
22 ratemaking integration with this GRC Application because, as discussed above, all of the
23 acquisitions are either authorized (as is the case with East Pasadena in D.21-08-002) or
24 remain pending. For the pending acquisitions, Commission decisions are expected by the
25 end of 2022. The Warring application is not opposed and the matter was submitted for a
26 decision as of March 2021. In the Bellflower matter, a settlement resolving all contested
27 issues was submitted for Commission approval in November 2021. Finally, California
28 American Water submitted an application for approval of its Bass Lake application that

1 received no protests and, consistent with the timeline established in D.99-10-064,
2 Appendix D, should receive a final decision before the end of 2022. In approving the East
3 Pasadena acquisition, the Commission ordered California American Water to address
4 aspects of ratemaking for the acquisition in this GRC proceeding.⁵ If the pending
5 acquisitions are not addressed in this GRC, then ratemaking integration likely will be
6 needlessly delayed until California American Water's next GRC application for test year
7 2027.

8
9 Q79. Can you describe the general approach for consolidation of these acquisitions for
10 ratemaking purposes?

11 A79. Yes, I can. As described in Special Request #5 of the Testimony of Jeffrey Linam,
12 California American Water requests authority to normalize the rate base of the
13 acquisitions to spread a portion of the authorized rate base statewide. This rate base
14 normalization will be accomplished by including the normalized rate base in Corporate
15 Office rate base, with the return on and of the associated rate base allocated statewide to
16 each district on a customer proportional basis. The portion of rate base not normalized
17 will remain with the districts proposed for consolidation.

18
19 Q80. Can you describe how you have forecasted what portion of rate base will be normalized
20 for these acquisitions?

21 A80. Yes, I can. This allocation was determined separately for each acquisition in a multi-step
22 process:

- 23
24 1) Forecast revenues, expenses, and rate base for the pre-acquisition systems on a
25 standalone basis;

26
27
28 ⁵ See, e.g., D.21-08-002, p. 45, Ordering ¶3.

- 2) Determine post-acquisition return on rate base for each system on a standalone basis incorporating synergies and the proposed rate base for each acquisition;
- 3) Calculate revenue requirement necessary to achieve California American Water's authorized rate of return for the post-acquisition standalone system;
- 4) Calculate the difference between forecasted revenues from step 1 and the revenues for the post-acquisition system at California American Water's authorized rate of return determined in step 2 above; and
- 5) Determine the rate base associated with the revenues determined in step 4, which then becomes the normalized rate base allocated to all post-acquisition California American Water customers, including those integrated from the acquisitions.

This rate base normalization methodology seeks to ensure increased revenue requirement related to the acquisition (not already covered by revenues generated by acquired customers at present rates) is spread over all post-acquisition customers of California American Water on a customer proportional basis through the General Office allocation.

Q81. Is this consistent with the ratemaking integration proposed in the acquisition applications?

A81. Yes, it is. As discussed below for each acquisition, the proposed ratemaking integration is consistent with the requested integration from each of the four proceedings.

Q82. Could you specifically describe the rate base treatment proposed for the Bellflower acquisition?

A82. Yes, I can. In A.18-09-013, California American Water requested authority to establish the rate base of the acquired system, at the time of a decision in that application, to be the

1 full purchase price paid for the Bellflower Municipal system's assets covered by the
2 Asset Purchase Agreement. Per the Purchase Agreement provided with A.18-09-013,
3 California American Water will pay \$17.0 million (plus or minus adjustments) for the
4 assets of Bellflower Municipal. As outlined in the Amended Direct Testimony of
5 Jonathan Morse in A.18-09-013, California American Water has requested rate base
6 determination equal to the \$17.0 million full purchase price with \$9,085,000 of the rate
7 base being allocated to the Los Angeles District and \$7,915,000 being allocated
8 statewide. The \$7,915,000 is treated as normalized rate base and is included in Corporate
9 Office rate base to be allocated state-wide per Special Request #11. I have included an
10 excerpt from the Amended Direct Testimony of Jonathan Morse within Attachment 2 of
11 my testimony in this GRC proceeding.

12
13 Q83. What is the alternative treatment if the Commission does not allow statewide recovery of
14 the normalized rate base in the manner requested?

15 A83. If the Commission does not allow recovery in the manner requested, the entire
16 Commission authorized acquisition price should be included as utility plant in service and
17 allocated entirely to the Southern Division rate base. As is, however, discussed in greater
18 detail below, allowing statewide recovery of the normalized rate base is the more prudent
19 option.

20
21 Q84. Could you specifically describe the rate base treatment proposed for the East Pasadena
22 acquisition?

23 A84. Yes, I can. First, in D.21-08-002, the Commission authorized California American Water
24 to include the \$34 million purchase price of East Pasadena's assets into California
25 American Water rate base in this GRC application. My proposed rate making treatment,
26 therefore, only relates to how the Commission should allocate those assets in rate base,
27 not to what the rate base determination should be. The Commission already authorized
28 inclusion in rate base of the \$34 million acquisition purchase price. As outlined in my

1 Direct Testimony in A.20-04-003, dated April 6, 2020, California American Water
2 requested \$17,610,000 of the authorized rate base be allocated to the Southern Division
3 with the remaining \$16,390,000 allocated statewide. The \$16,390,000 is treated as
4 normalized rate base and included in Corporate Office rate base to be allocated state-wide
5 per Special Request #5. I have included an excerpt from my Direct Testimony in A.20-
6 04-003 within Attachment 2 of my testimony in this GRC proceeding.

7
8 Q85. Did the Commission adopt California American Water's proposed rate making allocation
9 of the authorized rate base in D.21-08-002?

10 A85. The Commission neither adopted nor rejected the proposed rate making allocation
11 proposed by California American Water in the acquisition proceeding. Instead, the
12 Commission concluded that "Consideration of Cal-Am's proposal to allocate the rate
13 base between the proposed new consolidated district and its Corporate Office, which
14 would impact all Cal-Am's customers statewide, should be deferred to the next 2024
15 GRC."⁶ In deferring the rate base allocation issue, the Commission noted that California
16 American Water would "have an opportunity to fully analyze the correct basis for setting
17 rates in all of Cal-Am's districts including the possible new Southern District which will
18 include the former East Pasadena customers."⁷ The analysis supporting the proposed rate
19 base allocation for East Pasadena as well as for the Bellflower, Warring, and Bass Lake
20 systems is provided further in my testimony below.

21
22 Q86. What is the alternative treatment if the Commission does not allow statewide recovery of
23 the normalized rate base in the manner requested?

24 A86. If the Commission does not allow recovery in the manner requested, the entire
25 Commission authorized acquisition price should be included as utility plant in service and
26 allocated entirely to the Southern Division rate base. As is, however, discussed in greater

27 ⁶ D.21-08-002, Conclusion of Law ¶7, p. 43.

28 ⁷ D.21-08-002, p. 24.

1 detail below, allowing statewide recovery of the normalized rate base is the more prudent
2 option.

3
4 Q87. Could you specifically describe the rate base treatment proposed for the Warring
5 acquisition?

6 A87. Yes, I can. In A.20-04-017, California American Water requested authority to establish
7 the rate base of the acquired system, at the time of approval of that application, to be the
8 full purchase price paid by California American Water. Per the Purchase Agreement
9 provided with A.20-04-017, California American Water will pay \$4.6 million (subject to
10 possible adjustments) for the assets of Warring. As outlined in my Direct Testimony in
11 A.20-04-017, California American Water has requested rate base determination equal to
12 the \$4.6 million purchase price, with \$2,255,400 of the rate base being allocated to the
13 Los Angeles District and the remaining \$2,344,600 being allocated statewide. The
14 \$2,344,600 is treated as normalized rate base and is included in Corporate Office rate
15 base to be allocated state-wide per Special Request #11. I have included an excerpt from
16 my Direct Testimony in A.20-04-017 within Attachment 2 of my testimony in this GRC
17 proceeding.

18
19 Q88. What is the alternative treatment if the Commission does not allow statewide recovery of
20 the normalized rate base in the manner requested?

21 A88. If the Commission does not allow recovery in the manner requested, the entire
22 Commission authorized acquisition price should be included as utility plant in service and
23 allocated entirely to the Southern Division rate base. As is, however, discussed in greater
24 detail below, allowing statewide recovery of the normalized rate base is the more prudent
25 option.

26
27 Q89. Could you specifically describe the rate base treatment proposed for the Bass Lake
28 acquisition?

1 A89. Yes, I can. In A.22-03-002, California American Water requested authority to establish
2 the rate base of the acquired system, at the time of approval in that application, to be the
3 full purchase price paid by California American Water. Under the terms of the Asset
4 Purchase Agreement, and the Amendment to Asset Purchase Agreement, both of which
5 were provided with the Application, California American Water will acquire the
6 identified assets of Bass Lake for a purchase price consideration equal to \$5,923,933
7 million dollars (subject to possible adjustments). Specifically, the total purchase price
8 consists of the Cash Purchase Price of \$5,000,000 as described in the Asset Purchase
9 Agreement and the Commission-approved rate base offset of \$923,933 for the Pines Tank
10 Replacement. As outlined in my Direct Testimony in A.22-03-002, California American
11 Water has requested rate base determination equal to the \$5,923,933 purchase price with
12 \$4,446,500 of the rate base being allocated to the Northern Division and the remaining
13 \$1,476,800 being allocated statewide. The \$1,476,800 is treated as normalized rate base
14 and is included in Corporate Office rate base to be allocated statewide per Special
15 Request #11. I have included an excerpt from my Direct Testimony in A.22-03-002
16 within Attachment 2 of my testimony in this GRC proceeding.

17
18 Q90. What is the alternative treatment if the Commission does not allow statewide recovery of
19 the normalized rate base in the manner requested?

20 A90. If the Commission does not allow recovery in the manner requested, the entire
21 Commission authorized acquisition price should be included as utility plant in service and
22 allocated entirely to the Northern Division rate base. As is, however, discussed in greater
23 detail below, allowing statewide recovery of the normalized rate base is the more prudent
24 option.

25
26 Q91. Before continuing, is there anything you would like to clarify regarding the requested rate
27 base treatment for the Bellflower, East Pasadena, Warring, and Bass Lake acquisitions?
28

A91. Yes, I want to make it clear that the proposal to allocate some portion of rate base for these acquisitions statewide does not impact the authorized rate base determination approved in D.21-08-002 (East Pasadena) or change the requested rate base determination requested in Applications 18-09-013 (Bellflower), 20-04-017 (Warring), or 22-03-002 (Bass Lake). The proposal is simply to allocate statewide portions of the rate base that has been, or will be, authorized in those proceedings.

Q92. Could you expand on why the proposed statewide allocation benefits customers?

A92. Yes, I can. Table B below provides the impact of the normalized rate base for the four acquisitions, under three different scenarios, on a dollar per-customer per-month basis. Note that this analysis is based on the acquisition adjustment that is proposed to be allocated statewide and the assumption that the acquired utilities' pre-acquisition revenues are sufficient to cover their pre-acquisition rate base. In other words, this table shows the average impact on a per-customer basis of the portion of rate base California American Water proposes to allocate statewide. It is not intended to show the full customer impact of the acquisition integrations. Further, it is the average impact on a per-customer basis across all customer classes and across all districts. Actual impacts to different customers will depend on the rate design for the various customer classes across the various districts.

TABLE B

Acquisition Rate Base Normalization
(\$ per customer per month)

<u>Acquisition</u>	<u>Scenario 1: Acquired Utility (no consolidation)</u>	<u>Scenario 2: Division Consolidation</u>	<u>Scenario 3: Statewide Consolidation</u>
Bellflower	\$50.22	\$1.18	\$0.47
East Pasadena	\$54.03	\$2.09	\$0.83
Warring	\$47.85	\$0.35	\$0.14
Bass Lake	\$16.87	\$0.23	\$0.09

1
2
3 In Scenario 1, the acquisition adjustment stays with the acquired utility. In that scenario,
4 the acquired utility is allocated the full purchase price and there is no incremental cost
5 increase for any of California American Water's existing customers. For example, as
6 shown in the Table above, if Warring were acquired and the entire acquisition cost was
7 allocated to that utility's customers, the average cost per-customer per-month would be
8 \$47.85. In this scenario California American Water customers and Warring customers
9 capture the benefits from economies of scale, but Warring customers would bear the
10 financial burden.

11
12 In Scenario 2, the acquisition adjustment is spread over the acquired utility and the
13 California American Water Division proposed for consolidation. For example, as shown
14 in the Table, if Warring were acquired and the acquisition adjustment was spread over
15 Warring and California American Water's Southern Division, the average cost per-
16 customer per-month would be \$0.35. Thus, by allocating costs over the entire Division,
17 the cost per-customer per month decreases by \$47.50 per month for Warring customers,
18 while only increasing \$0.35 per customer per month for Southern Division customers.
19 Again, the benefits of consolidation are captured by all California American Water
20 customers, but the costs are spread over a wider customer base. However, the costs are
21 still allocated only to one subset of customers, those in the Southern Division, including
22 Warring.

23
24 In scenario 3, the acquisition adjustment is spread over all California American Water
25 customers. For example, as shown in the Table, if Warring were acquired and the
26 acquisition adjustment was spread over all California American Water customers, the
27 average cost per-customer per-month would be \$0.14 for all California American Water
28 customers. Thus, by allocating the acquisition adjustment over the entire state, the cost
per-customer per-month decreases by \$47.71 per-customer per-month for Warring

1 customers versus the no consolidation scenario, while only increasing \$0.14 per-customer
2 per-month for all California American Water customers (including Warring) under the
3 statewide consolidation scenario. Similarly, the cost per-customer per-month decreases
4 by \$0.21 per-customer per-month for Northern Division customers versus the Division
5 consolidation scenario, while only increasing \$0.14 per-customer per-month for all
6 California American Water customers (including Warring) under the statewide
7 consolidation scenario. In this case, the benefits of consolidation accrue to all customers,
8 and all customers are allocated a proportional share of costs. Further, since costs are
9 spread over a larger customer base, no single group of customers bears a larger financial
10 burden.

11
12 Clearly, California American Water's request to allocate portions of rate base related to
13 the acquisitions of East Pasadena, Warring, Bass Lake, and Bellflower will spread the
14 costs of the acquisitions over a larger customer base, thus mitigating rate increases. This
15 helps spread the benefits of consolidation to all customers, while ensuring customers of
16 the acquired customers do not bear a disproportional share of the financial burden. This is
17 in line with the goals of the California Legislature, State Water Resources Control Board,
18 and the Commission. I strongly encourage the Commission to adopt this proposal.

19
20 Q93. Are forecasted customers, sales, revenues, and expenses for the four acquisitions
21 incorporated into the overall forecasted revenue requirements in this GRC Application?

22 A93. Yes, they are. Integration of the estimated customers, sales, and revenues are addressed in
23 the Testimony of Bahman Pourtaherian in Section IV. Related effects on production
24 costs are addressed in Mr. Pourtaherian's testimony at Section V, and integration for rate
25 design purposes is discussed in Section X of Mr. Pourtaherian's testimony. Regarding
26 expenses, the integration of specifically identified existing employees of the Warring and
27 Bass Lake utilities are addressed in Section VII of the Testimony of Garry Hofer and in
28 Section VI of my testimony above. There are certain specifically identified incremental

1 expenses related to operation of the acquired (or to-be acquired) service areas. Examples
2 include contracted services, administrative expenses, rents, maintenance expense, and
3 customer accounting expenses, among others.
4

5 Q94. Are there any other ratemaking considerations related to the acquisitions you feel should
6 be addressed?

7 A94. Yes, there is another issue related to how the assets purchased in acquisitions are
8 accounted for in California American Water's utility plant accounting system. The
9 Commission's USOA provides accounting instructions for Utility Plant Purchased.⁸
10 These accounts provide that, unless otherwise authorized, the balances in the utility plant
11 accounts and depreciation and amortization accounts of the transferor (i.e. the acquired
12 utility) shall be booked to the utility plant and reserve accounts of the acquiring utility
13 and that excess amounts remaining shall then be closed to Account 100-5, Utility Plant
14 Acquisition Adjustments. In short, any additional purchased cost beyond the net book
15 value of the acquired utility is included as a utility plant acquisition adjustment
16 ("UPAA"). In this GRC, California American Water seeks authorization, as allowed by
17 the USOA, to deviate from this accounting methodology.
18

19 Q95. Can you detail how you propose to deviate from the USOA accounting instructions?

20 A95. Yes. For the Bellflower, East Pasadena, and Warring acquisitions, California American
21 Water requests authorization to book the acquisitions as gross plant with accumulated
22 depreciation. Under this methodology the acquired assets are "grossed up" so that the
23
24
25
26
27

28 ⁸ USOA for Class A Water Utilities prescribed by the Public Utilities Commission of the State of
California, effective January 1, 2018, p A50.

1 post-acquisition plant, less pre-acquisition depreciation reserve, equals the authorized
2 post-acquisition rate base.⁹

3
4 Q96. Would customers be impacted by the proposed deviation?

5 A96. No, customers would be indifferent. Ultimately, rate base is the same under both
6 representations, so the revenue impact is the same. Similarly, assuming the amortization
7 period for UPAA is consistent with the remaining useful life of the associated assets.
8 There should be no difference between depreciation expense and UPAA amortization, so
9 again cost of service is not impacted.

10
11 Since the gross plant with accumulated depreciation representation conforms with
12 GAAP, and since customers would be indifferent, I recommend the Commission
13 authorize California American Water to book the plant acquisitions as requested.

14
15 Q97. In D.21-08-002 the Commission authorized the acquisition of East Pasadena Water
16 Company and established the authorized rate base of \$34 million, but deferred
17 examination of the ratemaking treatment of the associated water rights within the overall
18 context of California American Water's operations and the acquisition until this GRC.
19 Can you address this issue?

20 A97. Yes, I can. In late 2021, upon close of the East Pasadena acquisition, the water rights
21 acquired in the purchase were booked to California American Water's utility plant
22 accounts at a value of \$26,700,000, which was the valuation of the water rights provided
23 in the Direct Testimony of Kevin M. Zanni submitted with Application 20-04-003. I
24
25

26
27 ⁹ For the Bass Lake acquisition this issue is addressed in A.22-03-002 with the request for Commission
28 authority "authorizing California American Water to record the acquisition on a net basis consistent
with generally accepted accounting principles."

1 recommend these water rights be included in the authorized \$34 million rate base at the
2 \$26.7 million value included in California American Water's utility plant accounts.

3
4 It is standard practice to include water rights in Commission authorized rate base. The
5 Commission's Uniform System of Accounts for Class A Water Utilities includes water
6 rights in Land and Land Rights, which are included in Utility Plant in Service.¹⁰ Water
7 rights are included in current authorized rate base for both California American Water
8 and East Pasadena. Water rights provide beneficial use and should be included in utility
9 plant in service, and thus in rate base.

10
11 Further, there is precedent for including water rights in the fair market valuation when
12 those rights are acquired, and thus necessarily in rate base. In approving California
13 American Water's acquisition of the Adams Ranch Mutual Water Company as well as
14 the water rights owned by Adams Ranch, the Commission determined the water rights
15 were "supported by a valuation study accepted by both parties and [that] is just and
16 reasonable."¹¹ Additionally, in approving California American Water's acquisition of the
17 assets of the Fruitridge Vista Water Company ("Fruitridge"), the Commission determined
18 that the Independent Appraisal provided in that case "properly includes all of Fruitridge's
19 assets."¹² That Independent Appraisal included within subject property "water
20 distribution assets," which it described as "wells, treatment facilities, distribution
21 facilities, maintenance assets, billing software, land and easements, buildings and all
22 facilities and equipment used in the production and delivery of water to customers,

23
24
25
26 ¹⁰ California Public Utilities Commission Uniform System of Accounts, Utility Plant Instruction 9, page
27 A55.

28 ¹¹ CPUC Resolution W-5080, Findings and Conclusion #9.

¹² D.19-12-038, pg 14.

1 including water rights and Fruitridge’s wholesale water service agreement with
2 Sacramento.”¹³

3
4 Pursuant to Cal. Pub. Util. Code Section 2720(a), “the commission shall use the standard
5 of fair market value when establishing the rate base value for the distribution system of a
6 public water system acquired by a water corporation. This standard shall be used for rate
7 setting.” Under Pub. Util. Code Section 2720(a), the meaning of fair market value comes
8 from Cal. Code of Civ. Proc. Section 1263.320, which states “fair market value... is the
9 highest price ... that would be agreed to by a seller... and a buyer... each dealing with
10 the other with full knowledge of the uses and purposes for which property is reasonably
11 adaptable and available.”¹⁴ D.99-10-064, Appendix D, at Section 2.05, sets forth the
12 guidelines for the appraisal utilities must present to the Commission in water system
13 acquisition proceedings. Section 2.05 specifically states the appraisal included with the
14 application “should include all assets, including the value of the land and the cost of
15 replacing the existing improvements, less accumulated depreciation.” (Emphasis
16 supplied). Water rights are an asset and a critical part of what California American Water
17 acquired from East Pasadena. The fair market value of those water rights was well-
18 supported by testimony in the East Pasadena acquisition proceeding. Thus, there is no
19 basis for failing to include the full value of water rights in rate base.
20

21 Q98. Is there anything else you would like to discuss relative to the Bellflower acquisition?

22 A98. Yes. The Bellflower Settlement discussed in my testimony above includes a provision
23 that the City of Bellflower has agreed to make \$5 million immediately available to
24 California American Water for addressing costs relating to post-acquisition capital
25 improvements to the former Bellflower Municipal system. That \$5 million does not

26 ¹³ D.19-12-038, pg 12.

27 ¹⁴ Cal. Code of Civ. Proc. Section 1263.320 also has a subsection (b), which applies where there is “no
28 relevant, comparable market” for the property in question. Here, as is noted in Mr. Payne’s
testimony, there is a robust market for the water rights at issue with comparable sales.

1 reduce California American Water’s \$17 million rate base addition resulting from the
2 acquisition. In this proceeding that \$5 million is incorporated as if it were grant funding
3 received at the time of the acquisition’s assumed close year of 2022 for ratemaking
4 purposes – i.e., amounts made available are to be recognized as contributions when made
5 available, not when improvements are made.
6

7 Q99. Is there anything else you would like to discuss relative to acquisition integration?

8 A99. Yes, I would like to provide an update regarding the integration of Hillview Water
9 Company (“Hillview”). The acquisition of Hillview was approved by the Commission in
10 D.19-11-003. In that Decision the Commission recognized the fair market value of the
11 system to be equal to the total purchase price of \$7,470,459,¹⁵ however, the Commission
12 only authorized the inclusion of \$6,500,000 in rate base.¹⁶ This \$6,500,000 was the cash
13 payment for the equity of Hillview. Although it was not allowed in rate base, California
14 American Water was authorized to amortize the \$970,459 difference between the total
15 purchase price and the authorized rate base¹⁷ over a 40 year period.¹⁸ The Commission
16 further authorized California American Water to amortize the allowance for deferred
17 income taxes of \$2,014,575 created by the transaction over a 40 year period.¹⁹
18 Ratemaking integration of Hillview incorporating the rate base and amortization
19 parameters established in D.19-11-003 was authorized by Decision 21-11-018.
20

21 The Commission recognized that the final balance sheet (assets, liabilities, and equity) of
22 Hillview would be incorporated into California American Water’s balance sheet at
23 acquisition.²⁰ Further, the final Hillview balance sheet would be different than what was
24

25 ¹⁵ D.19-11-003, pg 6 and Finding of Fact 1, pg 12.

26 ¹⁶ D.19-11-003, Ordering Paragraph 2, pg 13.

27 ¹⁷ Amortized purchase price = Fair Market Value – Authorized Rate Base
28 = \$7,470,459 - \$6,500,000 = \$970,459.

¹⁸ D.19-11-003, Ordering Paragraph 2, pg 13.

¹⁹ Ibid.

²⁰ D.19-11-003, pg 6.

1 incorporated into the original acquisition filing, thus impacting the final determination of
2 total purchase price. In D.19-11-003, the Commission determined that “All dollar
3 amounts set forth herein shall be adjusted as of the date of closing of the purchase of
4 Hillview Water Company, Inc.”²¹ The acquisition of Hillview Water Company was
5 closed on June 24th, 2020. In this GRC filing, California American Water provides the
6 updates to the dollar amount set forth in D.19-11-003. **Table C** below provides the
7 purchase accounting based on the information included in D.19-11-003 and the updated
8 purchase accounting based on the Hillview balance sheet at the close of the purchase.
9 Specifically, the Total Purchase Price increased from the estimated \$7,470,459 included
10 in D.19-11-003 to the final Total Purchase Price of \$7,930,410 reflected in Table C
11 below. Similarly, the tax adjustment increased from the estimated \$2,014,575 reflected in
12 D.19-11-003 to the final \$2,203,979 reflected in Table C below. The cumulative impact
13 is to increase the annual amortization of these items from \$74,626 to \$90,860. These
14 updated dollar amounts are incorporated into California American Water’s balance sheet
15 and into revenue requirement for the Northern Division in this GRC filing. Importantly,
16 the Commission authorized rate base of \$6.5 million is not impacted as a result of this
17 update.

28

²¹ D.19-11-003, Ordering Paragraph 6, pg 14.

TABLE C

	Purchase Accounting per D.19-11-003	Purchase Accounting at Acquisition Close
Equity Purchase Price:	6,500,000	6,500,000
Less: Total Equity	1,069,537	368,061
Preliminary UPAA, before tax gross up	5,430,463	6,131,939
Plus tax consequence of UPAA	2,014,575	2,203,979
Total UPAA	7,445,038	8,335,918
Rate Base		
Gross UPIS, net of SDWBA	8,983,178	23,771,163
Accumulated Depr	(3,944,126)	(5,787,531)
Net UPIS	5,039,052	17,983,632
Total UPAA	7,445,038	8,335,918
Materials	153,161	-
Working Cash	111,052	-
Net CIAC/Advances	(2,661,493)	(15,089,388)
Other Credits	(372,706)	-
Def Tax from stock purchase	(2,243,645)	(3,299,752)
Total Purchase Price	7,470,459	7,930,410
Amortized Purchase Price	(970,459)	(1,430,410)
Authorized Rate Base	6,500,000	6,500,000
40 year amortization items		
Non-Rate Base Purchase Price:	970,459	1,430,410
Tax Consequence of UPAA:	2,014,575	2,203,979
Total Amortization:	2,985,034	3,634,389
Amortization Period (years):	40	40
Monthly Amortization:	74,626	90,860

XII. SUPPORT SERVICES FOR HAWAII-AMERICAN WATER

Q100. Does California American Water provide support to any affiliate?

A100. Yes. California American Water provides management oversight and support to Hawaii American Water. This oversight and support is provided for the functional areas of Administration, Operations, Government Affairs, External Affairs, Engineering, Finance, Health and Safety, Information Technology, Legal, Procurement, Rates and Regulatory, and Human Resources.

Q101. Does the Company bill its costs to Hawaii American Water for the management oversight and support?

A101. Yes. California American Water bills Hawaii American Water quarterly based on the actual number of hours devoted to the management oversight and support.

Q102. How much was billed to Hawaii American Water over the last three years?

A102. California American Water billed Hawaii American Water \$156,493, \$103,118, and \$260,780 for the years 2019, 2020, and 2021, respectively.

Q103. In the current GRC, is the Company proposing to allocate a portion of its General Office (“GO”) costs to Hawaii American Water?

A103. Yes. The Company is proposing to allocate a total of \$247,122 of labor, labor-related, and general overhead costs to Hawaii American Water for the test year 2024.

Q104. How was this amount calculated?

A104. California American Water calculated a three-year average (2019-2021) of actual hours worked on Hawaii American Water by its employees. There were 28 employee positions identified who provided oversight and support to Hawaii American Water during this three-year period. The average number of hours by employee position was then multiplied by a projected hourly wage rate to determine the amount of labor cost to allocate to Hawaii American Water. Added to this amount was the applicable labor overhead costs for group insurance, pension, APP, ESPP, DCP, retiree medical, 401k, and payroll tax costs. The Company also included an allocation of general overhead costs from the GO based on a ratio of a three-year average of general overhead costs to labor costs. This ratio was 20.2%. The GO costs included in the general overhead are shown in the chart below.

Janitorial
Office & Admin Supplies
Security Service
Voice - Telephone
Voice - Cell
Wireless Service
Rents-Real Property
Rents-Equipment
M&S Maint
GO IT Costs - Personal Computing Devices
GO Fixed Asset Costs

As noted above, the total amount of costs allocated to Hawaii American for the projected test year 2024 is \$247,122.

Q105. In the last GRC settlement with Cal Advocates, approved in D.21-11-018, California American Water agreed to provide all employees with information and expanded training regarding the process and importance of accurately recording time for cost allocation purposes. Has California American Water complied with this?

A105. Yes. The Company developed a training module regarding the proper way to code hours and time spent on Hawaii American activities. The module title is Coding Labor and

1 Expenses for California Support to Hawaii. The module was rolled out to all employees
2 via the Company's online LEARN platform.

3
4 Q106. California American Water also agreed to provide the following specific details about its
5 GO expenses in the next GRC: (1) copy of the information provided to all employees
6 pertaining to recording time and cost allocation, (2) summary of employee time recorded
7 to operations outside of California-regulated operations for the period 2019 – 2021, and
8 (3) detailed summary of the specific expenses and assets that are appropriately allocated
9 to operations outside of California-regulated operations. Can you comment on this?

10 A106. Yes. Currently, California American Water only allocates to Hawaii American Water
11 which is outside of its California-regulated operations.

12
13 First, as discussed above, California American Water developed a training module
14 regarding the proper way to code employee hours and time spent on Hawaii American. A
15 copy of the training program is attached as Attachment 3 to my direct testimony.

16
17 Second, I have attached to my direct testimony, as Attachment 4 a summary of employee
18 time, in hours, recorded to operations outside of California-regulated operations for the
19 period of 2019-2021. All these hours were for oversight and support for Hawaii
20 American Water.

21
22 Third, I have attached to my direct testimony, as Attachment 5, a summary of the specific
23 expenses and assets that are appropriately allocated to operations outside of California-
24 regulated operations. Again, all these costs were for oversight and support for Hawaii
25 American Water.

26
27 **XIII. DEPRECIATION EXPENSE**

28 Q107. Please summarize the depreciation study performed by Alliance Consulting Group.

1 A107. California American Water engaged Alliance Consulting Group to conduct a depreciation
2 study of the Company's water and wastewater operations depreciable assets as of
3 December 31, 2020. The depreciation study is included as Attachment 6 to my
4 testimony.

5
6 Q108. Please summarize the conclusions reached in the depreciation study.

7 A108. The depreciation study and analysis performed by Alliance Consulting Group supports
8 setting depreciation rates that should be adequate to recover California American Water's
9 total investment in property over the estimated life of the assets. The depreciation study
10 recommends an increase of approximately \$2.0 million in annual depreciation expense
11 when compared to the depreciation rates currently in effect. As provided in Appendix B
12 of the depreciation study this change in depreciation expense consists of approximately
13 \$413,000 related to water and wastewater operations assets and \$1.627M related to AR
14 15 general plant asset groups as discussed below.

15
16 Additionally, the study recommends the adoption of vintage group amortization for
17 certain General plant accounts. As described in the study, the Federal Energy Regulatory
18 Commission ("FERC") adopted Accounting Release 15 ("AR15") in 1997. Since that
19 time, most utilities across the nation have adopted this methodology. With the adoption
20 of vintage group amortization, it is no longer necessary to keep track of the location and
21 retirement of specific assets. The goal of AR-15 is to reduce the administrative burden
22 related to tracking small dollar, large volume assets and to ensure the timely retirement of
23 those assets.

24
25 California American Water requests authority to implement the depreciation rates
26 proposed in the depreciation study and to implement vintage group amortization for the
27 general plants identified in the study, effective with Test Year 2024.
28

1 Q109. What are the primary drivers and causes of the depreciation expense increases?

2 A109. The existing depreciation rates were originally set in 2010. Over the course of time,
3 many of the life and net salvage parameters have become stale and not representative of
4 ongoing operations. As discussed in detail in the Depreciation Study report, the current
5 recommendations would adjust the lives and net salvage of many of the assets (in some
6 cases increasing, and in some cases, decreasing) to reflect current operations. The overall
7 change in the depreciation expense for water and sewer operations assets is an increase of
8 1.4 percent. There was a larger change in the depreciation expense for general plant
9 assets. This increase was driven by two primary factors. First, technology driven asset
10 groups (e.g., computers and controls, primarily in Sacramento and Monterey) are
11 experiencing shorter lives than what was set 12 years ago. The second is that many of the
12 general plant groups are in an under accrued position and the catch-up accrual for the
13 amortized assets is driving some of the increase.

14
15 Q110. Are these primary drivers and causes of the depreciation expense increases discussed in
16 more detail?

17 A110. Yes. As mentioned above, the overall depreciation expense increase in water and sewer
18 operational assets is 1.4 percent. Appendix B of the Depreciation Study report shows the
19 change in depreciation expense for each asset group. Appendix C shows the changes in
20 lives and net salvage for each individual asset group from the parameters set 12 years
21 ago. Within the body of the report, the analysis and operational input related to any
22 movement in lives is discussed. Appendix A shows the under accrued position for each
23 of the general plant asset groups and the impact on the overall depreciation expense
24 increase from each.

25
26 Q111. Have you provided a comparison of current and proposed depreciation rates, net salvage
27 rates, and service lives of each asset group?
28

1 A111. Yes, these comparisons are included in the depreciation study provided as Attachment 6
2 to my Direct Testimony. Specifically, the comparison of current and proposed
3 depreciation rates is provided in Appendix B of the study, and the comparison of current
4 and proposed salvage rates and curves, are provided in Appendix C of the study.
5 Additionally, the change in annual depreciation reserve is provided in Appendix A of the
6 study. All of these comparisons are provided by primary operating district and by asset
7 group.

8
9 Q112. What conclusions can be drawn from these comparisons?

10 A112. Operationally, there is very little overall movement in depreciation expense for water and
11 sewer assets. Due to the stale nature of the existing lives, there have been a number of
12 adjustments to lives and net salvage to reflect current operations. In general, though, the
13 increases and decreases mostly offset each other. The under accrued position and shorter
14 lives needed for technology-driven assets can also be seen in the comparisons for general
15 plant assets.

16
17 Q113. Have you provided workpapers supporting the annual depreciation rates?

18 A113. Yes, the workpapers are provided as Appendices A through E of the depreciation study.
19 Additionally, supporting workpapers are available upon request to the Commission's
20 Public Advocates and Water Division staff.

21
22 Q114. Why is it critical to implement general plant automatic retirement?

23 A114. The purpose of implementing general plant automatic retirement (as described in FERC
24 AR-15) is to both reduce the administrative burden of tracking high volume, low value
25 assets and to ensure the timely retirement of those assets. Most utilities across the
26 country have implemented this accounting as being beneficial to the accuracy and
27 timeliness of general plant fixed asset transactions. Adopting this accounting would allow
28 California American Water to have that same benefit.

1 Q115. Would the change in depreciation expense be impacted if you were not proposing to
2 implement general plant automatic retirement?

3 A115. No. Regardless of whether these calculations use the process described in FERC AR-15
4 or use normal remaining life depreciation rate calculations, the result would be
5 comparable. The increase in general plant depreciation expense, as discussed above, is
6 related primarily to the shorter operational lives for technology assets and the under
7 reserved position of many of the general plant accounts.

8
9 Q116. Do you have any other comments related to implementation of general plant automatic
10 retirement?

11 A116. Yes, as discussed in the depreciation study, an accrual is necessary for each affected plant
12 account to make up the difference between the book depreciation reserve and the
13 theoretical depreciation reserve.²² Alliance has proposed a 6-year amortization period for
14 reserve difference in their study, however, California American Water's RO Model used
15 to develop forecasted revenue requirement was not developed to include such
16 amortization. Therefore, in order to forecast a revenue requirement that incorporates the
17 amortization, Alliance provided depreciation accruals that integrate the amortization.
18 These rates are used for modeling purposes only. The rates proposed for Commission
19 approval are those provided in the depreciation study.

20
21 Q117. Does this conclude your testimony?

22 A117. Yes, it does.
23
24
25
26
27

28 ²² California-American Water Depreciation Rate Study at December 31, 2020; prepared
by Alliance Consulting Group, Pg 192-193

ATTACHMENT 1

Item	Status	Compliance Order	Comments	Decision/ Resolution
1	Ongoing	Water service including minimum standards for design and construction	All projects continue to be designed and constructed with GO103-A compliance in mind.	General Order 103-A
2	Ongoing	9. Cal-Am shall develop (a) a new quarterly report that provides California specific statistics, by district, from the national call center and that breaks out type of calls and final disposition of all complaints; and (b) a new quarterly report on all complaints received at district and regional levels and their final disposition. These reports shall be developed within 60 days of this decision and routinely filed on a quarterly basis with the Commission's Consumer Service and Information Division (CSID), and Water Division, and served on all parties to this proceeding.	With D.21-11-018, the quarterly report requirement was eliminated. The final quarterly report was submitted in 2021.	D. 06-11-050
3	Ongoing	California American Water Company shall incorporate within its Water Revenue Adjustment Mechanism and Modified Cost Balancing Account the following Unaccounted for Water Incentive Program For the Bishop, Hidden Hills, Monterey, and Ambler systems,	CAW complies with this requirement in its WRAM filings	D. 09-07-021
4	Ongoing	For the Ralph Lane and Chualar systems, which are not included in the WRAM, the penalty/reward amounts will be calculated as above but will be assessed to customers by a separate one-time surcredit/surcharge.	The penalty/rewards amounts have been calculated.	D. 09-07-021
5	Ongoing	CAW shall convene and provide logistical and staff support for a Monterey District fire official task force to prioritize Monterey District fire protection upgrade projects, with consensus recommendations of the task force reduced to writing.	California American Water's engineering department engages with local fire flow task force and fire departments. California American Water meets with FD's regularly to discuss status of projects and determine next projects targeted for completion.	D. 09-07-021
6	Ongoing	For the Bishop, Hidden Hills, Monterey, and Ambler systems Cal Am - a. Provide the total water production for each system for the preceding calendar year .	This reward/penalty calculation is included in our WRAM/MCBA annual AL filings.	D. 09-07-021
7	Ongoing	Cal-Am shall report on free water usage in its annual conservation report.	This information is provided in the annual conservation report.	D. 09-07-021
8	Ongoing	For the Bishop, Hidden Hills, Monterey, and Ambler systems - c. Calculate the actual unaccounted for water for the period by determining the difference between each system's production meters and the sum of all the system's customer meters.	This reward/penalty calculation is included in our WRAM/MCBA annual AL filings.	D. 09-07-021
9	Ongoing	For the Bishop, Hidden Hills, Monterey, and Ambler systems - d. Subtract the actual volume of unaccounted for water from the adopted volumes calculated in item b. above for each system.	This reward/penalty calculation is included in our WRAM/MCBA annual AL filings.	D. 09-07-021
10	Ongoing	For the Bishop, Hidden Hills, Monterey, and Ambler systems - e. Multiply the difference calculated in item d. above by \$2,018.79/acre-foot based on the adopted standard rate of \$4.5345/Ccf.	This reward/penalty calculation is included in our WRAM/MCBA annual AL filings.	D. 09-07-021
11	Ongoing	For the Bishop, Hidden Hills, Monterey, and Ambler systems - b. Calculate each system's adopted unaccounted for water quantity by multiplying the adopted percentage from the table in Section 6.1.11 in the Decision by the actual production quantity for percentage.	This reward/penalty calculation is included in our WRAM/MCBA annual AL filings.	D. 09-07-021
12	Ongoing	For the Bishop, Hidden Hills, Monterey, and Ambler systems - c. Calculate the actual unaccounted for water for the period by determining the difference between each system's production meters and the sum of all the system's customer meters.	This reward/penalty calculation is included in our WRAM/MCBA annual AL filings.	D. 09-07-021
13	Ongoing	Ordering paragraph #3, Consistent with the adopted tariff rule, California-American Water Company shall implement its rationing plan as follows a. At the direction of Monterey Peninsula Water Management District, initiate each rationing stage of Monterey District Rule 14.1.1 based on three triggers. Two of these triggers, the physical shortage trigger and the regulatory constraints trigger, are automatic based on defined criteria. The third trigger is by Monterey Peninsula Water Management District resolution in the case of an emergency.	Pursuant with rule 14.1.1, Monterey County District is in stage one and coordinating with MPWMD to implement the appropriate conservation measures.	D. 09-07-023
14	Ongoing	b. Provide individual customer variances from flow restrictor requirements and rationing requirements as recommended by Monterey Peninsula Water Management District through its variance and appeal process as set forth in Monterey Peninsula Water Management District's Rule 169 Water Rationing Variance of Regulation XV.	Monterey County District is not currently in a rationing stage and Rule 169 is no longer in effect. Should rationing be triggered by MPWMD, CAW would comply with all necessary steps.	D. 09-07-023
15	Ongoing	c. Delay implementation of a rationing stage for up to 90 days at the direction of Monterey Peninsula Water Management District's General Manager to ensure adequate operation of California-American Water Company's rationing program.	Pursuant with rule and schedule 14.1 as part of D1612003, Cal Am would work in coordination with MPWMD to implement the appropriate conservation and rationing stages.	D. 09-07-023
16	Ongoing	Ordering The corporate identification number U-210-W assigned to California American Water shall continue to be used by California American Water and shall be included in all original filings with the CPUC and in the titles and other pleadings filed in existing cases.	California American Water continues to include its corporate identification number U-210-W, as assigned, in all original filings with the CPUC and in the titles and other pleadings filed in existing cases.	D. 07-05-031
17	Completed	2010 calendar year The settlement provides that by March 31 of each year, Cal Am will provide the Water Division (with a copy to DRA) a written report on the status of the WRAM and MCBA balances. If the report shows the net balances exceeds 2.5% of a district's total recorded revenue requirement for the prior calendar year.	All reports through the 2020 calendar year were filed in compliance with this requirement unless authorization to file at a later time was received. This requirement has now been superseded by the requirements of D.12-04-048, D.12-06-016, D.18-12-021, D.21-11-018.	D. 08-06-002

Item	Status	Compliance Order	Comments	Decision/ Resolution
18	Completed	2010 calendar year Cal Am will file an advice letter within 30 days that amortizes the balance through a volumetric surcharge if it is an under-collection, or a volumetric surcredit if it is an over-collection. If the 2.5% threshold is not met, these balancing accounts will be amortized in the next GRC.	All reports through the 2020 calendar year were filed in compliance with this requirement unless authorization to file at a later time was received. This requirement has now been superseded by the requirements of D.12-04-048, D.12-06-016, D.18-12-021, D.21-11-018.	D. 08-06-002
19	Completed	The settlement provides that by March 31 of each year, Cal Am will provide the Water Division (with a copy to DRA) a written report on the status of the WRAM and MCBA balances. If the report shows the net balances exceeds 2.5% of a district's total recorded revenue requirement for the prior calendar year, Cal Am will file an advice letter within 30 days that amortizes the balance through a volumetric surcharge if it is an under-collection, or a volumetric surcredit if it is an over-collection. If the 2.5% threshold is not met, these balancing accounts will be amortized in the next GRC.	All reports through the 2020 calendar year were filed in compliance with this requirement unless authorization to file at a later time was received. This requirement has now been superseded by the requirements of D.12-04-048, D.12-06-016, D.18-12-021, D.21-11-018.	D. 08-11-023
20	Ongoing	Section 8 of the settlement provides that Cal Am will review the deeds and/or contracts of the "free water" customers and will take reasonable and necessary action to limit the customers' usage to the amount of water this is legally available under the deeds/contracts, and will also determine whether it can negotiate termination of free service and if so, at what cost.	This issue was subsequently addressed in D 15-04-007. Operations continues to work with Legal to assess free water accounts.	D. 09-02-006
21	Ongoing	Cal-Am shall report on free water usage in its annual conservation report as well in its July 1, 2010 general rate case application	This information is included in each annual conservation report.	D. 09-02-006
22	Completed	In addition to the settlement's July 1, 2010 reporting requirement for free water usage, we find that Cal Am should also include in its annual conservation report a section discussing the actions it has taken to address free water usage and the results of those actions.	Information on free water usage has previously been provided in the Annual Monterey Conservation Reports filed with the CPUC. CAW is proposing to eliminate this reporting requirement in the 2022 GRC Application as the free water usage was researched and addressed in the 2016 GRC.	D. 09-02-006
23	Completed	2011-Also included in the annual summary report will be Cal Am's evaluation of the effectiveness of its public outreach programs. One means Cal Am will use in its evaluation is to survey its customers on how they learned about Cal Am's programs; MPWMD will place similar questions on the customer rebate forms. The annual report will be submitted to the Division of Water and Audits, with copies served on this service list, and due on May 1 of the succeeding calendar year for all activity of the prior calendar year.	Information has been included in the Annual Monterey Conservation Report filed with the CPUC. CAW is proposing to eliminate this reporting requirement in the 2022 GRC Application. CAW's public outreach efforts are extensively discussed in the Annual Conservation Report provided with the CPUC Annual Report.	D. 09-05-029
24	Completed	California-American Water Company shall monitor and report the customer consumption and water savings calculations specified in Section 4 of the Settlement Agreement in Annual Summary Reports and in its next Monterey District general rate case application. The Annual Summary Reports shall be submitted to the Commission's Division of Water and Audits, with copies served on this proceeding's service list.	Information has been included in the Annual Monterey Conservation Report filed with the CPUC. This requirement was eliminated per D.21-11-018.	D. 09-05-029
25	Ongoing	b.Provide a minimum per person water ration of 35 gallons per day during rationing Stages 5-7.	Monterey County District is in stage one and coordinating with MPWMD to implement the appropriate conservation measures. The district would comply with conservation measures should it enter into higher stages of conservation.	D. 09-07-023
26	Ongoing	If the 100 basis point deadband is exceeded, [utility] will file a Tier 2 advice letter by October 15 that updates return on equity and related rate adjustments to become effective on January 1 of the following year. The advice letter would also update long-term debt and preferred stock costs to reflect actual August month-end embedded costs in that year and forecasted interest rates for variable long-term debt and new long-term debt and preferred stock scheduled to be issued.	The WCCM has not triggered and Cal-Am filed a new cost of capital application for TY 2022 on May 3, 2021, thus no Tier 2 will be filed on October 15, 2021.	D. 09-07-051, D. 12-07-009, D.18-03-035
27	Completed	In its (California American Water) comprehensive conservation report to the Commission, should contain the following documentation. o CAW's actual expenditures on conservation budgets, broken down by major category or BMP o Actual number of rebates, or equipment/devices provided or installed, and the amount of incentive payments for each type of equipment/device, by program name o Estimated water savings in hundred cubic feet and dollars based on the number of rebates, or equipment/devices provided or installed (including cost per hundred cubic feet or acre-foot) o Name of organizations from which CAW received grant funds and the amount of funds granted, and a full accounting of how the funds were spent and results achieved o Actual administrative, management and personnel costs incurred by program o Actual advertising, marketing and promotional expenses by program	Data is being provided annually in the Annual Conservation Report filed in lieu of PUC report Schedule E-3 with the CPUC. BMPS are no longer the basis of reporting and this compliance item will be expired following the 2022 GRC Application.	D. 10-06-038

Item	Status	Compliance Order	Comments	Decision/ Resolution
28	Ongoing	California American Water agrees with DRA that all future Comprehensive Planning Study and Condition Based Assessment documents will contain the name, the signature, and the license number of the registered professional engineer who supervised the preparation.	The 2018 and 2019 Comprehensive Planning Studies and Condition Based Assessment documents included in the 2019 final GRC application include a stamp containing the name, the signature, and the license number of the registered professional engineer who supervised the preparation. As agreed, all future Comprehensive Planning Study and Condition Based Assessment documents will also include a stamp containing the name, the signature, and the license number of the registered professional engineer who supervised the preparation of said documents.	D. 10-06-038
29	Completed	1. Each investor-owned water utility shall account for local or federal grants, government loans, damage awards, settlements, government ordered funds and insurance proceeds used to replace contaminated water supplies as Contributions in Aid of Construction as set forth in sections 5.1 through 5.3 of this decision. The rules in Appendix A are adopted. The rules proposed in Appendices B and C shall be considered in a comment and, if needed, workshop process preparatory to our adoption of rules pertaining to contamination proceeds arising from government loans, damage awards, settlements, government orders and insurance.	November 15, 2021, California American Water received \$3,657,555.28 in Water Contamination proceeds which were put in a regulatory liability memo account until the need for making expenditures arises and the commission directs them to another 265 sub account.	D. 10-10-018
30	Completed	2. Each investor-owned water utility shall establish the following numbered sub-accounts within Account 265 of the Uniform System of Accounts for Water Utilities. a. Sub-account number 265.1, entitled Government Grant Contamination Proceeds shall be used for booking contamination related local and federal government grant proceeds. b. Sub-account number 265.2, entitled Government Loan Contamination Proceeds shall be used for booking contamination related government loan proceeds. c. Sub-account number 265.3, entitled Damage Award Contamination Proceeds, shall be used for booking contamination proceeds derived from damage awards. d. Sub-account number 265.4, entitled Settlement Contamination Proceeds shall be used for booking contamination related settlement proceeds. e. Sub-account number 265.5.1, entitled Government Order Contamination Proceeds From Private Funds shall be used for booking contamination related proceeds deriving from a private funding source via government order. f. Sub-account number 265.5.2, entitled Government Order Contamination Proceeds From Public Funds shall be used for booking contamination related proceeds deriving from a public funding source via government order. g. Sub-account number 265.6, entitled Insurance Contamination Proceeds shall be used for booking insurance contamination proceeds.	November 15, 2021, California American Water received \$3,657,555.28 in Water Contamination proceeds which were put in a regulatory liability memo account until the need for making expenditures arises and the commission directs them to another 265 sub account.	D. 10-10-018
31	Completed	3. When contamination proceeds arising from federal and local government grants and government loans are received they shall be placed directly in the appropriate dedicated 265 sub-account.	November 15, 2021, California American Water received \$3,657,555.28 in Water Contamination proceeds which were put in a regulatory liability memo account until the need for making expenditures arises and the commission directs them to another 265 sub account.	D. 10-10-018
32	Ongoing	4. When contamination proceeds arising from damage awards, settlements, government order or insurance are initially received from the funding source, they shall be placed in a memorandum account until the need for making expenditures arises	November 15, 2021, California American Water received \$3,657,555.28 in Water Contamination proceeds which were put in a regulatory liability memo account until the need for making expenditures arises and the commission directs them to another 265 sub account.	D. 10-10-018
33	Ongoing	4.1. Whereupon an approval to transfer the proceeds to the appropriate dedicated 265 sub-account shall be sought by a Tier 3 advice letter filing.	CAW received settlement proceeds to recover future treatment costs for contamination in its Sacramento service area. Advice Letter 1351 was filed on 12/16/2021 requesting to establish a Memo Account to track contamination proceeds. AL 1351 was approved on January 31, 2022. CAW has not completed capital infrastructure related to contamination proceeds and a recovery has not yet been accounted, or filed for.	D. 10-10-018
34	Ongoing	6. Within 45 days after a funding agency authorizes a utility to spend Grant Funds on expenses the utility must file a Tier 3 advice letter filing that sets forth an accounting treatment to exclude such expenses from the Results of Operations and forecast of future expenses in a general rate case.	CAW has not received any grant funds since the last regulatory compliance submittal with General Rate Case Application 19-07-004. Upon receipt, CAW will perform this requirement.	D. 10-10-018
35	Ongoing	Appendix A&B #19- For plant wholly funded by a grant, as well as for the partially funded portion of a plant, the utility must notify the Director of the DWA within 45 days after the utility signs a letter of commitment with the agency administering the fund .	CAW has not received government grant funding from contamination proceeds.	D. 10-10-018
36	Ongoing	20- All utilities that receive Grant Funds must provide the following information regarding its grant-funded plant in its Annual Report to the Commission (1) Amount of Grant Funds received, (2) Amount of Grant Funds spent in the year covered by the Annual Report, and (3) Description of plant constructed with Grant Funds.	CAW has not received government grant funding from contamination proceeds.	D. 10-10-018

Item	Status	Compliance Order	Comments	Decision/ Resolution
37	Ongoing	1. A rate surcharge shall be established which provides for a period of one year an amount of revenue approximately equal to the periodic payment which includes principal and interest. Any surplus surcharge revenue shall be refunded to ratepayers. The annual adjustments to the surcharge shall be done through a Tier 2 Advice Letter filing.	CAW received settlement proceeds to recover future treatment costs for contamination in its Sacramento service area. Advice Letter 1351 was filed on 12/16/2021 requesting to establish a Memo Account to track contamination proceeds. AL 1351 was approved on January 31, 2022. CAW has not completed capital infrastructure related to contamination proceeds and a recovery has not yet been accounted, or filed for.	D. 10-10-018
38	Completed	1. Within 45 days after a funding agency authorizes a utility to spend Loan Funds on expenses the utility must file a Tier 3 advice letter filing that sets forth an accounting treatment to exclude such expenses from the Results of Operations and forecast of future expenses in a general rate case.	November 15, 2021, California American Water received \$3,657,555.28 in Water Contamination proceeds which were put in a regulatory liability memo account until the need for making expenditures arises and the commission directs them to another 265 sub account.	D. 10-10-018
39	Completed	1. These rules apply to all tangible property funded through Water Contamination proceeds. In determining the proceeds in each of the following types of sales, the cost of disposal shall be deducted from the amount received in arriving at the final amount received. In cases of intangible property, such as the intellectual property of a study, the utility shall provide as part of its general rate case filing sufficient information for the Commission to individually review the matter in the utility's general rate case or, sooner if requested, by separate application.	November 15, 2021, California American Water received \$3,657,555.28 in Water Contamination proceeds which were put in a regulatory liability memo account until the need for making expenditures arises and the commission directs them to another 265 sub account.	D. 10-10-018
40	Ongoing	Appendix A #15. In order to ensure that the Commission has prior review and approval over all transactions associated with plant funded by Water Contamination proceeds, water utilities shall notify the Director of the Water Division and the Director of the Division of Ratepayer Advocates 45 days prior to the disposition and encumbrance of plant funded by Water Contamination proceeds.	The total amount of funds received by Cal Am (on 11/16/2021) was \$3,657,555.28. No plant construction with these funds as of 2/15/2022.	D. 10-10-018
41	Ongoing	Appendix A #19. For plant wholly funded by Water Contamination proceeds, as well as for the partially funded portion of a plant, the utility must notify the Director of the Water Division within 45 days after the utility receives the funds. For any portion of plant that is paid for by non-Water Contamination proceeds, the utility must obtain Commission approval in its general rate case or through separate application.	The total amount of funds received by Cal Am (on 11/16/2021) was \$3,657,555.28. No plant construction with these funds as of 2/15/2022.	D. 10-10-018
42	Ongoing	Appendix C #14. All utilities that receive Water Contamination proceeds must provide the following information regarding plant funded by Water Contamination proceeds in its Annual Report to the Commission (1) Amount of Water Contamination proceeds received, (2) Amount of Water Contamination proceeds spent in the year covered by the Annual Report, and (3) Description of plant constructed with Water Contamination proceeds.	The total amount of funds received by Cal Am (on 11/16/2021) was \$3,657,555.28. No plant construction with these funds as of 2/15/2022.	D. 10-10-018
43	Ongoing	IV.C The utility shall list all shared directors and officers between the utility and its affiliates in its annual report to the Commission. Not later than 30 days following a change to this list, the utility shall notify the Director of the Division of Water and Audits and the Director of the Division of Ratepayer Advocates of the change(s).	CAW continues to report changes made to list.	D. 10-10-019
44	Ongoing	IV.E.1 (as modified by D.11-10-034) A utility shall track and report to the Commission all employee movement between the utility and affiliates, consistent with Rule VIII.F.	CAW continues to monitor employee movement consistent with Rule VIII.F.	D. 10-10-019
45	Ongoing	IV.E.2 (as modified by D.11-10-034) When an employee of a utility is transferred, assigned, or otherwise employed by the affiliate, the affiliate shall make a one-time payment to the utility in an amount equivalent to 15% of the employee's base annual compensation. All such fees paid to the utility shall be accounted for in a separate memorandum account to track them for future ratemaking treatment on an annual basis, or as otherwise necessary to ensure that the utility's ratepayers receive the fees. This transfer payment provision does not apply to clerical workers.	CAW has implemented procedures to remain in compliance with this item, per its most recent ATR Compliance Plan effective 6/1/2021. The next compliance report is not due until 2023.	D. 10-10-019
46	Ongoing	VII.B. (ATRs - Bond Downgrading). If the parent is publicly traded, the utility shall notify the Director of the Commission's Division of Water and Audits and the Director of the Division of Ratepayer Advocates in writing within 30 days of any downgrading to the bonds of the parent, another affiliate, and/or the utility, and shall include with such notice the complete report of the issuing bond rating agency.	CAW continues to inquire with Corporate Treasury each month regarding this item. No notification is required unless there is a downgrading. Only two downgradings have occurred since implementation of the Rules - specifically in 2011 and notice was sent at that time as required; and one in April 2019, and notice was sent at that time. The 2021 independent audit found CAW in compliance with this Rule.	D. 10-10-019

Item	Status	Compliance Order	Comments	Decision/ Resolution
47	Completed	VIII.C. (ATRs - Biennial Compliance Plans). Compliance Plans. Each utility shall include a compliance plan as part of its annual report, starting in 2011 with the 2010 annual report and biennially thereafter. The compliance plan shall include 1. A list of all affiliates of the utility, as defined in Rule II.D, and for each affiliate a description of its purposes or activities, and whether the utility claims that Rule I.B makes any portion of these Rules applicable to the affiliate; 2. A description of the procedures in place to assure compliance with these Rules; and 3. A description of both the specific mechanisms and the procedures that the utility and parent company have in place to assure that the utility is not utilizing the parent company or any of its affiliates not covered by these Rules as a conduit to circumvent any of these Rules in any respect. The description shall address, but shall not be limited to (a) the dissemination of information transferred by the utility to an affiliate covered by these Rules, (2) the provision of services to its affiliates covered by these Rules or (c) the transfer of employees to its affiliates covered by these Rules in contravention of these Rules. A corporate officer from the utility and parent company shall verify the adequacy of these specific mechanisms and procedures to ensure that the utility is not utilizing the parent company or any of its affiliates not covered by these Rules as a conduit to circumvent any of these Rules.	CAW filed its ATR Compliance Plan effective 6/1/2021. The next compliance report is not due until 2023.	D. 10-10-019
48	Completed	VIII.E Independent Audits. Commencing in 2013, and biennially thereafter, the utility shall have an audit performed by independent auditors if the sum of all unregulated affiliates' revenue during the last two calendar years exceeds 5% of the total revenue of the utility and all of its affiliates during that period. The audits shall cover the last two calendar years which end on December 31, and shall verify that the utility is in compliance with these Rules. The utility shall submit the audit report to the Director of the Division of Water and Audits and the Director of the Division of Ratepayer Advocates no later than September 30 of the year in which the audit is performed. The Division of Water and Audits shall post the audit reports on the Commission's web site. The audits shall be at shareholder expense.	The 2021 audit was completed.	D. 10-10-019
49	Ongoing	VIII.F (ATRs - Annual Affiliate Reports). Annual Affiliate Transaction Reports. Each year, by March 31, the utility shall submit a report to the Director of the Division of Water and Audits and the Director of the Division of Ratepayer Advocates that includes a summary of all transactions between the utility and its affiliated companies for the previous calendar year. The utility shall maintain such information on a monthly basis and make such information available to the Commission's staff upon request. The summary shall include a description of each transaction and an accounting of all costs associated with each transaction although each transaction need not be separately identified where multiple transactions occur in the same account (although supporting documentation for each individual transaction shall be made available to the Commission staff upon request). These transactions shall include the following 1. Services provided by the utility to the affiliated companies; 2. Services provided by the affiliated companies to the utility; 3. Assets transferred from the utility to the affiliated companies; 4. Assets transferred from the affiliated companies to the utility; 5. Employees transferred from the utility to the affiliated companies; 6. Employees transferred from the affiliated companies to the utility; 7. The financing arrangements and transactions between the utility and the affiliated companies; 8. Services provided by and/or assets transferred from the parent holding company to affiliate company which may have germane utility regulations impacts; and 9. Services provided by and/or assets transferred from affiliated company to the parent holding company which may have germane utility regulation impacts.	Annual affiliate transaction reports are included in CAW's annual reports as Schedule E-4. The 2021 independent audit found CAW in compliance with this Rule.	D. 10-10-019
50	Ongoing	X.E. Annual Report of NTP&S Projects. Each utility shall include information regarding its NTP&S projects in its Annual Reports, including but not be limited to the following 1. A detailed description of each NTP&S activity; 2. Whether and why it is classified active or passive; 3. Gross revenue received; 4. Revenue allocated to ratepayers and to shareholders, as established in the company's current general rate case; 5. A complete identification of all regulated assets used in the transaction; 6. A complete list of all employees (by position) that participated in providing the non-tariffed service, with amount of time spent on provision of the service; 7. If the NTP&S has been classified as active through advice letter submission, provide the number of the advice letter and the authorizing Resolution; and 8. If the NTP&S did not require approval through advice letter, provide the date notice was given to the Commission.	California American Water has continued to report all non-tariffed products and services its provides in Schedule E-4 of its Annual Report. The last annual report for 2021 was submitted to the CPUC on June 15, 2022.	D. 10-10-019

Item	Status	Compliance Order	Comments	Decision/ Resolution
51	Ongoing	X.F. When a utility initiates the offering of NTP&S that are designated as active or passive in the table below, the utility shall provide notice of such activity by letter to the Director of the Division of Water and Audits and the Program Manager of the Division of Ratepayer Advocates-Water Branch, within 30 days of instituting such activity.	California American Water has implemented procedures or mechanisms to help ensure compliance with this Rule.	D. 10-10-019
52	Ongoing	of new NTP&S not included in the table below, using the excess capacity of assets or resources reflected in the utility's revenue requirement, and which are proposed to be classified as active as described herein, shall file a Tier 3 advice letter (see Resolution ALJ-202) with the Director of the Division of Water and Audits seeking Commission approval. The advice letter shall be served on the service list for Rulemaking 09-04-012 and the service list for the utility's current or most recent general rate case. The advice letter shall contain the following: 1. A full description of the proposed NTP&S, including, without limitation, the identity of parties served (if known), revenue and cost forecasts, and the term of any contract to be employed. 2. A description of the accounting method to be used to allocate the incremental costs between tariffed services and caused by the NTP&S. 3. Copies of all operative documents for the proposed service. 4. A detailed description of any items other than postage, power, taxes, and purchased water for which the utility proposes pass-through treatment for purposes of calculating revenue sharing. 5. Complete identification of all utility regulated assets and personnel resources that will be used in the proposed transaction. Identify the particular excess capacity (or capacities) asset or resource to be used to provide the NTP&S. 6. A complete list of all employees that will participate in providing the service, with an estimate of the amount of time each will spend. 7. A showing that the proposed NTP&S may be offered without adversely affecting the cost, quality, or reliability of the utility services. 8. A showing of how the NTP&S will be marketed with minimal or no incremental ratepayer capital, minimal or no new forms of liability or business risk, and no undue diversion of utility management attention. 9. A showing of how the NTP&S does not violate any law, regulation, or Commission policy regarding anti-competitive practices. 10. A justification for classifying the NTP&S as active. The utility shall demonstrate that there is or will be incremental shareholder investment above \$125,000. 11. A statement that all risks incurred through this proposed NTP&S project shall be borne by the utility's shareholders. 12. A description of the market served by the proposed NTP&S project, a list or description of the current incumbents in that market, and an analysis of how the utility's entry into the market will affect the market's competitiveness. Include in this analysis a description of how the utility will guard against using anti-competitive pricing in this market. 13. Any other information, opinions, or documentation that might be relevant to the Commission's consideration	California American Water has implemented procedures or mechanisms to help ensure compliance with this Rule.	D. 10-10-019
53	Completed	2. A combined trigger default mechanism is adopted, as described in Decision 10-10-018, at section 5.5.2.3., whereby an investor-owned water utility may request cost recovery, through either a Tier 3 Advice Letter or a pending General Rate Case, of the balance in a contamination-related litigation expense memorandum account after either of the following has occurred the balance in the memorandum account exceeds 2% of the utility's authorized revenue requirement or three years have elapsed since the date the memorandum account was established. An investor-owned water utilities may seek by application a different, customized interim cost recovery mechanism. Litigation related expenses recovered from ratepayers shall be subject to refund upon the investor-owned water utilities obtaining a damage award.	AL 905 approved in W-4925. CAW is in compliance with this specification.	D. 10-12-058
54	Completed	1. GO 156 should be amended to require electronic filing of annual reports and posting of the reports on the Commission's website.	CAW is in compliance with this order. The most recent GO 156 annual report was filed with the CPUC by March 1, 2022.	D. 12-06-015
55	Completed	3. GO 156 should be amended to require utilities to report the total number of WMDVBEs that received direct spend in the year reported.	CAW is in compliance with this order. The most recent GO 156 annual report was filed with the CPUC by March 1, 2022.	D. 12-06-015
56	Completed	4. GO 156 should be amended to require utilities to include in their annual reports the approximate amount of funds, to the extent available, directly expended on developing and distributing technical assistance to WMDVBEs and small businesses.	CAW is in compliance with this order. The most recent GO 156 annual report was filed with the CPUC by March 1, 2022.	D. 12-06-015
57	Completed	1. General Order 156 is amended as set forth in Attachment C.	CAW is in compliance with this order. The most recent GO 156 annual report was filed with the CPUC by March 1, 2022.	D. 12-06-015

Item	Status	Compliance Order	Comments	Decision/ Resolution
58	Ongoing	Moratorium California American Water shall deny request for new service connections and prohibit any increased use of water at existing service addresses from a change in zoning or use 1. (e) This special condition shall expire at the filing by California-American Water Company of a Tier 1 advice letter with the Commission transmitting the written concurrence of the Deputy Director of Water Rights of the State Water Resources Control Board with California-American Water Company's finding that a permanent supply of water is ready to serve as a replacement for the unlawful diversions of Carmel River water.	California-American Water is in compliance with this specification. A replacement permanent supply will not be ready until at least 2025.	D. 11-03-048
59	Ongoing	5. Upon the receipt by California-American Water Company of the written concurrence of the Deputy Director of Water Rights of the State Water Resources Control Board with California-American Water Company's finding that a permanent supply of water is ready to serve as a replacement for the unlawful diversions of Carmel River water, California-American Water Company shall file a Tier 1 advice letter transmitting the written concurrence and removing from its tariffs the special condition contained in Ordering Paragraph 1 of this decision.	California-American Water has not received written concurrence; therefore, this provision has not been triggered.	D. 11-03-048
60	Ongoing	6. In the event that the judicial outcome of the consolidated litigation in the Superior Court of Santa Clara (case nos. 1-10-CV-163328, 1-10-CV-183439, and 1-10-CV-183454) clarifies, limits, or nullifies WR 2009-0060 in whole or part in a manner that conflicts with the orders in this decision, California-American Water Company shall file a petition to modify this decision within 30 days of that judicial outcome.	To date, there has not been any judicial outcome that clarifies, limits or nullifies WR 2009-0060.	D. 11-03-048
61	Ongoing	7. In the event the State Water Resources Control Board provides written direction to California-American Water Company interpreting WR 2009-0060 in a manner that conflicts with the orders in this decision, or modifies WR 2009-0060 in a manner that conflicts with the orders in this decision, California-American Water Company shall file a petition to modify this decision within 30 days of that Board action.	To date, the SWRCB has not issued written directions, orders or interpretations of WR 2009-0060 that conflict with D.11-03-048.	D. 11-03-048
62	Completed	Class A water utilities should ensure that household size is requested from all participants/applicants in the application and recertification process, regardless of qualification option.	Household size is being requested as part of the application. However, household size data is not being provided with customer info obtained through the energy utility data sharing program	D. 11-05-004
63	Completed	1. California-American Water Company shall use 2003-2007 as a baseline to determine compliance with the 1-2% annual reduction or, in the alternative, shall use a 10-year baseline using the Department of Water Resource's methodology if a) that baseline only uses calendar years prior to the implementation of their conservation rate designs and includes 2003-2007; or b) the utility attaches supporting workpapers to justify use of the Department of Water Resource's methodology.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report. SBX 7-7 compliance reporting has been provided with CAW's 2021 Urban Water Management Plans. SB 606, AB 1668 is creating new water use objectives for water purveyors that is replacing SBX7-7. This item is complete and will expire following the 2022 GRC Application.	D. 11-05-004
64	Completed	3. The Information-Only Conservation Data Report, attached to this decision as Attachment 2, is adopted. California-American Water Company ... shall file this report as an information-only filing concurrent with their Annual Reports. These Class A water utilities shall commence collecting conservation data in the format adopted in Attachment 2 no later than 60 days after the issuance of this decision.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report. SBX 7-7 compliance reporting has been provided with CAW's 2021 Urban Water Management Plans. SB 606, AB 1668 is creating new water use objectives for water purveyors that is replacing SBX7-7. This item is complete and will expire following the 2022 GRC Application.	D. 11-05-004
65	Completed	4. The Information-Only Low-Income Data Report, attached to this decision as Attachment 3, is adopted. California-American Water Company ... shall file this report as an information-only filing concurrent with their Annual Reports. These Class A water utilities shall commence collecting low-income data in the format adopted in Attachment 3 no later than 60 days after the issuance of this decision but shall report low-income household size data no later than concurrently with their 2013 Annual Reports.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report. SBX 7-7 compliance reporting has been provided with CAW's 2021 Urban Water Management Plans. SB 606, AB 1668 is creating new water use objectives for water purveyors that is replacing SBX7-7. This item is complete and will expire following the 2022 GRC Application.	D. 11-05-004
66	Completed	5. California-American Water Company ... shall have the alternative of complying with the California Urban Water Conservation Council's Best Management Practices through compliance with the Flex Track Option. These Class A water utilities shall submit a modified California Urban Water Conservation Council Best Management Practices compliance report in their Annual Reports.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report. SBX 7-7 compliance reporting has been provided with CAW's 2021 Urban Water Management Plans. SB 606, AB 1668 is creating new water use objectives for water purveyors that is replacing SBX7-7. This item is complete and will expire following the 2022 GRC Application.	D. 11-05-004
67	Completed	6. California-American Water Company shall track California Urban Water Conservation Council's Best Management Practices compliance costs in the Information-Only Conservation Data Report, adopted in Ordering Paragraph 3.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report. SBX 7-7 compliance reporting has been provided with CAW's 2021 Urban Water Management Plans. SB 606, AB 1668 is creating new water use objectives for water purveyors that is replacing SBX7-7. This item is complete and will expire following the 2022 GRC Application.	D. 11-05-004

Item	Status	Compliance Order	Comments	Decision/ Resolution
68	Completed	7. California-American Water Company ... shall provide the average bill impact of surcharges resulting from the amortization of Water Revenue Adjustment Mechanisms and Modified Cost Balancing Accounts on participating low-income program customers in the annual Low-Income Data Report. If a Class A water utility obtains a Water Revenue Adjustment Mechanism and Modified Cost Balancing Account after this decision issues, that Class A water utility also shall provide the average bill impact of these surcharges.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report	D. 11-05-004
69	Completed	10. The Information-Only Low-Income Data Report, attached to this decision as Attachment 3, is adopted. California-American Water Company shall file this report as an information-only filing concurrent with the Annual Reports.	Data is being provided in Annual Conservation and Low Income OII reporting filed as Attachment to the Annual PUC report	D. 11-05-020
70	Completed	13. Each Class A water utility shall include in its general rate case application a low-income assistance program participation estimate, as developed in the informal workshop to be scheduled by the Division of Water and Audits.	Low income program participation estimate is being provided in CAW's GRC	D. 11-05-020
71	Ongoing	9. In the event of any unauthorized disclosure of Confidential Customer Data, the utility responsible for such disclosure must immediately notify in writing the other utility with which it has entered into a data sharing agreement.	To date, there has been no recorded incident of unauthorized disclosure.	D. 11-05-020
72	Ongoing	11. Regulated water utilities must obtain customer authorization from all customers, both current and new, to share Confidential Customer Data by including a declaration statement on both 1) the low income assistance program application; and 2) the re-certification and random post-enrollment verification forms; that reads as follows: "I understand that [insert regulated water utility name] can share my information with other utilities or their agents to enroll me in their assistance programs."	Customer authorization is being obtained on both low income application and recertification applications of California American Water.	D. 11-05-020
73	Completed	13. Regulated water utilities need not request re-certification and/or random post enrollment verification directly from the customer if said customer is also enrolled in CARE and the re-certification and/or random post enrollment verification requirement has been successfully established by the energy utility for its CARE program.	California American Water is complying with this in its data-sharing, low-income program.	D. 11-05-020
74	Ongoing	VIII.D (ATRs - New Affiliates). New Affiliates. Upon the creation of a new affiliate, the utility shall immediately notify the Commission of its creation, as well as posting notice of this event on its web site. No later than 60 days after the creation of this affiliate, the utility shall file an information-only filing, as provided for in Rule 6.1 of General Order 96-B, with the Director of the Commission's Division of Water and Audits, with service on the Director of the Division of Ratepayer Advocates. The advice letter shall state the affiliate's purpose or activities and whether the utility claims these Rules are applicable to the new affiliate, and shall include a demonstration to the Commission that there are adequate procedures in place that will assure compliance with these Rules. The advice letter may include a request, including supporting explanation, that the affiliate transaction rules not be applied to the new affiliate. If the utility requests that the affiliate transactions rules not be applied to the new affiliate, in lieu of an information-only filing, the utility shall file a Tier 2 advice letter making such a request, including an explanation of why these Rules should not apply to the new affiliate.	CAWC continues to make the required notifications and filings on new affiliates as required by the Rule. The 2021 independent audit found CAWC in compliance with this Rule.	D. 11-10-034
75	Completed	California American Water shall file financial statements as required by General Order 65A.	California American Water has provided all quarterly financial statement reports to the Commission and will continue to provide all subsequent reports once they become available.	General Order 65-A
76	Ongoing	(a) the names titles and duties of all Executive Officers and the compensation received by each such Executive Officer; "Executive Officer" includes the President, Secretary, Treasurer, and Vice President in charge of a principal business unit, division or function of the respondent. It also includes any other person who performs policy making functions and is employed by the respondent;	California American Water has continued to report these to the Division of Water and Audits as a part of its Annual Report filing. The most recent filing was for the year ended December 31, 2021 and was filed June 15, 2022	General Order NO. 77-M
77	Ongoing	And (b) the names, titles and duties of all employees other than the officers named above who received compensation at the rate of \$125,000 or more per annum, and the compensation received by each such employee;	California American Water has continued to report these to the Division of Water and Audits as a part of its Annual Report filing. The most recent filing was for the year ended December 31, 2021 and was filed June 15, 2022	General Order NO. 77-M
78	Ongoing	(c) the amount of the expense account, any contingent fees or other moneys directly or indirectly paid to each such officer and employee named in the statement.	California American Water has continued to report these to the Division of Water and Audits as a part of its Annual Report filing. The most recent filing was for the year ended December 31, 2021 and was filed June 15, 2022	General Order NO. 77-M

Item	Status	Compliance Order	Comments	Decision/ Resolution
79	Completed	Recovery of amounts recorded in the Cease and Desist Order Memorandum Account shall be reviewed in California-American Water Company's next general rate case for its Monterey District. California-American Water Company shall bear the burden when it requests recovery of the recorded costs, to show that they are not costs covered by other authorized rates, it is appropriate for ratepayers to pay for these categories of costs in addition to otherwise authorized rates, the utility acted prudently when it incurred these costs and the level of booked costs is reasonable.	Balances in the CDO Memorandum Account are part of the testimony of Michael Clarke in the 2022 GRC. Recovery of recorded amounts for this application are included in the testimony of Michael Clarke.	R. W-4824
80	Completed	Non-revenue water should be reported as percentages as well as volumes.	Monthly reports track both percentages and volumes by District. Non-revenue volume and percentage are also included in the General Rate Case Minimum Data Requirement E.2.	D. 12-06-016
81	Ongoing	Parties agree that California American Water shall establish fully justified water loss reduction plans based on an economically derived business case or cost benefit analysis that will assist California American Water in ensuring that economically feasible priorities are set for further water loss reduction projects in all of its districts.	Beginning in 2028, all California Urban Retail Water Suppliers must meet a system-specific volumetric real loss standard. California American Water is planning to implement a program that minimizes the risk of exceeding real loss target when SWRCB water loss standards are enforced in 2028.	D. 12-06-016
82	Completed	California American Water shall use the term known as "non-revenue water" in accordance with the AWWA Water Loss Audit in lieu of the outdated term "Unaccounted for Water". California American Water shall use the definitions and nomenclature defined by the AWWA Water Loss Audit for uniformity and consistency throughout the service territory.	We are using the term non-revenue water and report as such in accordance with AWWA compliance and included in the General Rate Case Minimum Data Requirement E.3.	D. 12-06-016
83	Ongoing	Cal Am shall as a minimum, track, monitor and report, one performance indicator that is consistent with terms used in the 20 by 2020 Water Conservation Plan -- "real losses per service connection per day."	Real losses per service connection per day are tracked monthly. This is also included in the annually submitted AWWA Water Audits and in the General Rate Case Minimum Data Requirement E.3..	D. 12-06-016
84	Completed	California American Water shall set specific water loss targets for each three-year GRC period, with the objective of targeting the lowest volume of non-revenue water that can be achieved on a cost-effective basis.	Beginning in 2028, all California Urban Retail Water Suppliers must meet a system-specific volumetric real loss standard. California American Water is planning to implement a program that minimizes the risk of exceeding real loss target when SWRCB water loss standards are enforced in 2028. This is further addressed in MDR E.4.	D. 12-06-016
85	Ongoing	The AWWA Water Audit shall be completed annually for each system and compared to previous years	AWWA Water Audits are performed annually and compared to previous years. The NRW audits are included in the General Rate Case Minimum Data Requirement E.3.	D. 12-06-016
86	Ongoing	To ensure that DRA is able to track progress towards managing levels of NRW, California American Water will provide at least annually (coincident with March 31 annual report to CPUC) the accomplishments of the NRW program,	A non-revenue water program summary is included in the CPUC Annual Report. The 2021 CPUC Annual Report was filed with the Division of Water and Audit on June 15, 2022.	D. 12-06-016
87	Ongoing	NRW Volume for the 12-month Period	The Rolling 12 Month NRW is tracked monthly. Annual information is also included in the Minimum Data Requirements E.2 and E.3 that are a part of the General Rate Case submittals.	D. 12-06-016
88	Completed	Periodic Summary Reports (Leak Report -- Service and Main; Leak Report -- Service and Main Leaks; Leak Detection Report; Meter Testing / Meter Replacement)	This information is included in the NRW Report. MDR E.6 contains the Historical Main/Service Leaks for CA for 2011-2015. MDR E.7 contains information on the Leak Detection Program. MDR E.5 contains information on the Meter Replacement Programs	D. 12-06-016
89	Completed	Activities Report -- (California American Water will report accomplishments compared to plans, based on the Action Plans identified in section 5.2)	Water loss accomplishments are reported as required.	D. 12-06-016
90	Completed	Parties agree that the Appendix in the Rate Case Plan decision must be revised to comport with the intention of the AWWA Water Loss guidance in this paragraph, which uses outdated terminology such as "unaccounted for water"....Additionally, the revisions should clarify that the Commission will expect the utilities to develop water loss reduction programs in accordance with AWWA Water Loss guidelines, and that the utilities shall submit goals for maximizing water loss reduction to the extent cost effective.	Revisions occurred as required.	D. 12-06-016
91	Completed	Customer Service - DRA and California American Water agree that California American Water will provide a trend analysis that includes explanations of all significant increases or decreases in the number of customer calls and complaints on an annual basis. DRA and California American Water also agree that California American Water will include a copy of each of the 12 quarterly reports with its next GRC application.	Customer Service trend analyses are provided in the GO 103-A Call Center Statistics Report.	D. 12-06-016
92	Ongoing	California American Water agreed to continue to provide in its California American Water-MPWMD Joint Conservation Report for Monterey County district actual and estimated water savings per measure/program as shown in its 2010 Joint Conservation Report.	California American Water (CAW) provides this data in its Annual Monterey Conservation Reports. CAW is proposing to eliminate this reporting requirement in the 2022 GRC Application as this data is also being provided annually in the Annual Conservation Report filed in lieu of PUC report Schedule E-3 with the CPUC.	D. 12-06-016

Item	Status	Compliance Order	Comments	Decision/ Resolution
93	Ongoing	California American Water also agreed to continue to provide in its annual report for each district, as shown in its 2010 Water Conservation Program Annual Summary Report (Schedule E-3), estimated water savings per year, per measure and lifetime measure savings for each quantifiable program.	Data is being provided annually in the Annual Conservation Report filed in lieu of PUC report Schedule E-3 with the CPUC	D. 12-06-016
94	Ongoing	In addition, California American Water agreed to include in its annual report for each district, 10 random audits for each new quantifiable program.	Data has been provided annually as Attachment to its Annual Conservation Report filed in lieu of PUC report Schedule E-3 with the CPUC	D. 12-06-016
95	Ongoing	California American Water will include in its annual report a detailed conservation summary report as shown in [the table in Section 7.1.4 of this settlement].	Data is being provided annually in the Annual Conservation Report filed in lieu of PUC report Schedule E-3 with the CPUC	D. 12-06-016
96	Ongoing	05610702 – Fought Road Well and Pipeline- California American Water agrees to keep DRA apprised of its efforts to purchase water from Sonoma County Water Agency.	California American Water continued its agreement for 0.33 MGD in additional daily supply from SCWA through 2025. CAW is monitoring demand trends as a result of the drought and the 2017 fires. In addition, CAW is working with other water utilities in the Santa Rosa Plain GSA to identify multi benefit projects that can provide additional water supplies.	D. 12-06-016
97	Completed	DRA and California American Water agree that California American Water shall retire the Duarte Irrigation System during the period from 2015-2017 and transition the irrigation customers to the potable system.	All customers have been retired from the irrigation system. Project completion included retirement of three reservoirs and the lemon booster station, all of which was completed in 2021.	D. 12-06-016
98	Ongoing	Special Request #27 Annual Depreciation Updates – All Districts - California American Water shall review annually the accruals to depreciation reserve which shall be determined for each primary plant account by dividing the original cost of depreciable utility plant less estimated future net salvage less depreciation reserve by the estimated remaining life of the surviving plant of the account; and the calculations and the results of the reviews shall be submitted to the Division of Water and Audits annually with a request to implement such results for book depreciation purposes. California American Water will file this report for all of its districts each year on July 1 based on December 31 prior year balances.	Cal-Am continues to comply with this requirement through the rate case process.	D. 12-06-016
99	Completed	Special Request #30 Duarte Irrigation Rate Design - In the next GRC [2015-2017], the irrigation system will be retired and the remaining irrigation customers will be shifted to a potable water tariff. At that time, California American Water will make any requests regarding rate design and tariffs for these customers. Any requests that are based on historical water rights will be fully supported and documented.	Approved in the 2013 GRC (D.15-04-007). The irrigation system retirement was completed in 2020.	D. 12-06-016
100	Completed	Utilities shall report on their efforts in their General Order (GO) 156 Annual Reports, including but not limited to i. Number of WMDVBE firms that have been appointed as lead underwriter, co-manager, or other roles in debt securities offerings within the reporting period. 1. The position(s) held by the WMDVBE firms. 2. The percentage of each debt issue allocated to each MDVBE firm. 3. The dollar amount of these debt securities issuances.	CAW is in compliance with this order. The most recent GO 156 annual report was filed with the CPUC by March 1, 2022.	D. 12-06-015
101	Completed	GO 24-C II. For the second year after authorization of this GO and for every year thereafter, on or before 60 days following June and December of that year, the information required by Sections A and B in the preceding period, certified by an authorized representative of the corporation issuing stocks, bonds or other evidences of indebtedness, or by the partnership or individual authorized to issue bonds or other evidences of indebtedness shall be filed with the Commission.	Cal Am has provided all required 24-C reports on a semi-annual basis as required.	D. 12-06-015
102	Completed	GO 24-C III. If a utility has no reportable transactions for the applicable period (quarterly/semi-annually), it may state such as its GO 24 C report for that period.	Cal Am has provided all required 24-C reports and will continue to provide the required reports on a semi-annual basis.	D. 12-06-015
103	Completed	2.(o) The revenue requirement on the regulatory asset will move into base rates at the time of the first General Rate Case after the final review of all project costs.	This request was included in the testimony of Cal Am witness Jeffrey Dana in the 2016 GRC application and was approved for rates effective 1/1/2018 by D.18-12-021.	D. 12-06-040
104	Ongoing	[The fixed cost of \$414,672] shall not change for each year over the period of time water is purchased and delivered to the Monterey District for use by District customers, shall not be subject to further review, escalation, or modification, and may in no way be increased to reflect any other cost related to the Sand City Desalination Plant.	Cal Am has continued to use the same requested amount in each subsequent GRC as required. This same request will be included in the 2022 GRC.	D. 13-04-015
105	Ongoing	[The Sand City Moratorium Exception Tariff] shall apply to new service connections in Sand City so long as the service connection moratorium established in Decision 11-03-048 remains in effect for the Monterey District	The moratorium is still in place. California American Water will not deny service to all new customers within the area served by the Sand City Water Entitlement pursuant to MPWMD Ordinance 132 and Rule 23.6.	D. 13-04-015
106	Ongoing	1. California-American Water Company (Cal-Am) will be provided with adequate capital from American Water Works Company, Inc. (American Water) to fulfill all of its service obligations prescribed by the Commission and Cal-Am.	California American Water has been provided adequate capital to date	D. 07-05-031

Item	Status	Compliance Order	Comments	Decision/ Resolution
107	Completed	The LAMA is not a guarantee of the eventual recovery of revenue shortfalls and the burden of proof of the reasonableness of the revenue shortfalls charged to the account is the responsibility of Cal Am. If Cal Am seeks recovery in rates of revenue shortfalls tracked in the LAMA in its next general rate case, it has the burden of proof to show that: (1) it acted prudently when it incurred these revenue shortfalls; (2) the level of booked revenue shortfalls is reasonable; (3) the revenue shortfalls incurred are not covered by other authorized rates; and (4) it is appropriate for ratepayers, as a matter of policy, to pay for these categories of revenue shortfalls in addition to otherwise authorized rates.	The requested recovery of the Leak Adjustments recorded to the LAMA was approved in D.21-11-018 and the LAMA was closed.	R. W-4951
108	Ongoing	Each Investor-Owned Water and Sewer Utility shall report in its respective general rate case, the amount(s) of recycled water being sold annually by treatment type, the wholesale and retail price(s), and identity of the recycled water supplier(s).	CAW does not sell recycled water at this time. New projects including Pure Water Monterey may need to be reported in the future.	D. 14-08-058
109	Ongoing	Pursuant to the Minimum Criteria Requirements adopted in this decision, contracts and partnerships entered into by the Investor-Owned Water and Sewer Utilities must fully disclose the key terms of the agreement(s) concerning project cost allocation and sharing, and the responsibilities for the construction, operation, and maintenance of the recycled water infrastructure facilities.	All projects will include proper disclosures set forth in the Minimum Criteria Requirements.	D. 14-08-058
110	Ongoing	The Investor-Owned Water and Sewer Utilities shall incorporate the comparative analysis of energy costs and savings into the cost-benefit analysis for each proposed recycled water project.	California American Water will continue to complete this analysis for each proposed project.	D. 14-08-058
111	Ongoing	The Investor-Owned Water and Sewer Utilities shall consider a comparative analysis of recycled water and alternative sources of water supply in terms of greenhouse gas emissions. This analysis shall be an informative component in the cost-benefit analysis for each proposed recycled water project to the extent that the data needed for such comparative analysis exist or can be reasonably produced or collected.	CAW has done this environmental analysis with the GWR project in Monterey and will continue to do so for each proposed project.	D. 14-08-058
112	Ongoing	To receive Commission approval, recycled water projects must have a determination of compliance with or exemption from the California Environmental Quality Act and/or National Environmental Protection Act.	Recycled water projects may be requested in a GRC, and CEQA / NEPA compliance would be completed prior to construction and after CPUC rate approval via a GRC.	D. 14-08-058
113	Ongoing	When embarking on a recycled water project the Investor-Owned Water and Sewer Utilities shall explore and take advantage of appropriate opportunities for joint recycled water projects and arrangements with other public water supply and wastewater treatment agencies. To the extent feasible, such activities shall be compatible with Integrated Regional Water Resource planning in the applicable region, and if practicable, each Investor-Owned Water and Sewer Utility shall conduct its water supply planning for recycled water in a manner consistent with the relevant portions of the Integrated Regional Water Resource plan for its region.	CAW continues to incorporate this requirement in the preparation of its Comprehensive Planning Studies.	D. 14-08-058
114	Ongoing	Investor-Owned Water and Sewer Utility ratepayers shall not assume an unjust or unreasonable share of the recycled water project costs when public and private partnerships are involved.	CAW agrees with this and has worked on the GWR project in Monterey to make sure allocations are reasonable and will continue to do so for all projects.	D. 14-08-058
115	Ongoing	Investor-Owned Water and Sewer Utilities shall seek opportunities to partner with public agencies or otherwise to identify and secure lower-cost public funding to cover or contribute to the cost of their recycled water projects.	CAW agrees with this and will continue to do so for all recycled water projects.	D. 14-08-058
116	Ongoing	1. Each Investor-Owned Water and Sewer Utility shall report in its respective general rate case, the amount(s) of recycled water being sold annually by treatment type, the wholesale and retail price(s), and identity of the recycled water supplier(s). 2. Pursuant to the Minimum Criteria Requirements adopted in this decision, contracts and partnerships entered into by the Investor-Owned Water and Sewer Utilities must fully disclose the key terms of the agreement(s) concerning project cost allocation and sharing, and the responsibilities for the construction, operation, and maintenance of the recycled water infrastructure facilities. 3. The Investor Owned Water and Sewer Utilities shall incorporate the comparative analysis of energy costs and savings into the cost-benefit analysis for each proposed recycled water project. The ratemaking treatment of recycled water project costs shall consider all the costs and benefits the project will provide for IOWSU customers in the service area and region where the project will be implemented. 6. The Investor Owned Water and Sewer Utilities shall consider a comparative analysis of recycled water and alternative sources of water supply in terms of greenhouse emissions. This analysis shall be an informative component in the cost-benefit analysis for each proposed recycled water project to the extent that the data needed for such comparative analysis exist or can be reasonably produced or collected. (continued in another section. Search under D.14-08-058)	To be done as needed. California American water continues to pursue and seek authorization for recycled water projects in its rate case filings. Projects in the Los Angeles, San Diego, and Sacramento districts hold promise, have been discussed in prior rate case testimony and will continue to be brought forward. These potential projects will comply with the Minimum Criteria Requirements.	D. 14-08-058

Item	Status	Compliance Order	Comments	Decision/ Resolution
117	Ongoing	Consistent with the accounting rules and ratemaking policies adopted in D.10-12-058, utility plant that is not funded by the Investor-Owned Water and Sewer Utilities, or paid for by low interest public loans or grants, shall be treated as contributed plant for ratemaking purposes.	CAW is in compliance with this requirement and it is being reviewed in each GRC filing.	D. 14-08-058
118	Ongoing	As part of the Minimum Criteria Requirements the Investor-Owned Water and Sewer Utilities shall provide information on a) The current cost, availability and demand for both potable and recycled water supplies in the Investor-Owned Water and Sewer Utilities' service area where the project is being proposed; b) the potential demand for the proposed project's recycled water supply by prospective customers; and c) the factors used or considered in setting the recycled water incentives, including wholesaler discounts and/or assistance with customers retrofits costs. If the discounts provided for in the above paragraphs are greater than the water utility's reduction in costs, the water utility may include the aggregate amount of that discount in its revenue requirements to be applied to, and recovered in, rates that are applicable to all general metered customers.	To be done as needed. California American water continues to pursue and seek authorization for recycled water projects in its rate case filings. Projects in the Los Angeles, San Diego, and Sacramento districts hold promise, have been discussed in prior rate case testimony and will continue to be brought forward. These potential projects will comply with the Minimum Criteria Requirements.	D. 14-08-058
119	Ongoing	The Investor-Owned Water and Sewer Utilities must make a showing that demonstrates to the Commission's satisfaction the prudence of each recycled water project and reasonableness of the associated costs specified in the minimum criteria requirements prior to recovery of recycled water project costs from metered service customers. The aforementioned showing must include a cost-benefit analysis for new recycled water projects.	California American water continues to pursue and seek authorization for recycled water projects in its rate case filings. Projects in the Los Angeles, San Diego, and Sacramento districts hold promise, have been discussed in prior rate case testimony and will continue to be brought forward. Each discussed project will comply with a cost-benefit analysis.	D. 14-08-058
120	Ongoing	When an Investor-Owned Water and Sewer Utility undertakes a recycled water project, it shall identify and review consumer education materials and methods that are available industry-wide, and, where appropriate, take reasonable steps with any public agency partners to utilize existing resources before developing duplicative or more costly materials. The IOWSUs shall include with their recycled water proposals, information on the consumer education materials and methods they will use to educate customers about the benefits associated with the use of recycled water.	California American water continues to pursue and seek authorization for recycled water projects in its rate case filings. Projects in the Los Angeles, San Diego, and Sacramento districts hold promise, have been discussed in prior rate case testimony and will continue to be brought forward. CAW will comply with the order to contain materials costs for any future projects.	D. 14-08-058
121	Ongoing	California-American Water Company (CalAm) may recover legal costs and interest on the balance carried in the Special Request 1 Surcharge Balancing Account. CalAm may file an application to seek recovery of the following Regional Desalination Project-related legal costs pursuant to the process adopted in Decision (D.) 12-07-008, as modified by D.12-11-031 1) \$446,831.56, plus \$17,193.68 in interest through September 30, 2012, which were removed from this application pursuant to a Commission ruling in this proceeding; and 2) \$65,761.19, plus interest of \$2,827.98 through December 31, 2012, which were removed during settlement discussions. Nothing in this decision prevents CalAm from tracking and seeking recovery of Regional Desalination Project-related legal costs pursuant to the process adopted in D.12-07-008, as modified by D.12-11-031.	Cal-Am continues to pursue recovery from Marina Coast. Pending outcome of the legal proceeding, Cal-Am will assess a potential future application of legal and related costs.	D. 14-12-008
122	Ongoing	The Commission authorizes California-American Water Company's (Cal-Am's) to recovery of \$1,918,033, plus interest and fees pursuant to Decision 10-08-008 and Decision 11-09-039, through Cal-Am's Special Request 1 Surcharge Balancing Account, which equates to its request of \$2,682,590 minus \$764,557. This disallowance does not prejudice or prejudice any future request by Cal-Am for recovery of the \$764,557 in a future application.	Costs were transferred to the CWP Balancing Account and collected through Surcharge #1.	D. 15-03-002
123	Completed	The Amended Partial Settlement Agreement is adopted in part and denied in part. Specifically, Special Requests Nos. 16 is denied and Special Request No.18 and 32 are adopted with the additional requirement that California-American Water Company be required to file a formal application to recover costs associated with penalties and fines levied by the State Water Resource Control Board.	The memorandum account was addressed through advice letter 1072-B in accordance with OP #3 of D.15-04-007	D. 15-04-007
124	Completed	Going forward, California-American Water Company shall include in its Minimum Data Requirements the status of all projects authorized by the Commission in the last general rate case including including 1. Advice letter projects; 2. Multi-year projects; 3. Projects authorized in the test years but not built for whatever reason, even if the project is temporarily on hold and California-American Water Company expects to complete the project; 4. Projects authorized in all test years, even if the reporting occurs during a particular test year; 5. Projects authorized in all test years, even if the project is currently in progress; and 6. Projects authorized in all test years, even California-American Water Company expects the project to be	California American Water is complying with this requirement as part of the 2022 GRC filing.	D. 15-04-007
125	Completed	The Minimum Data Requirements shall also include the status of projects authorized by the Commission in the last general rate case on both a recorded and forecast basis through the end of the prior general rate case cycle. California-American Water Company must update the status as close to the application date as reasonably possible, and any further updates must be provided in response to data requests issued in the general rate case.	California American Water is complying with this requirement as part of the 2022 GRC filing.	D. 15-04-007

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126	Completed	Each electrical, gas, water, wireless telecommunications service provider, and telephone corporation with gross annual revenues exceeding twenty-five million dollars (\$25,000,000), including their commission-regulated subsidiaries and affiliates, shall, starting with their 2016 annual reports (filed in March 2016 to report on the prior year's activities) and plans, begin reporting annually on their procurement purchases from Lesbian, Gay, Bisexual and/or Transgender business enterprises (LGBTBEs) and their progress in meeting the procurement goals for the LGBTBEs as directed in this decision.	CAW is in compliance with this order. The most recent GO 156 annual report was filed with the CPUC by March 1, 2022.	D. 15-06-007
127	Completed	We adopt, Conclude a Second Proposal, with some modifications, by adopting the below outlined five-year plan and framework toward setting the numerically-based target percentage goal(s) for the Lesbian, Gay, Bisexual and/or Transgender business enterprises (LGBTBEs) and direct each electrical, gas, water, wireless telecommunications service provider, and telephone corporation with gross annual revenues exceeding twenty-five million dollars (\$25,000,000), including their commission-regulated subsidiaries and affiliates (collectively Utilities), as follows (a) In 2015, the first year of implementation of the LGBTBEs' inclusion in the General Order (GO) 156 Program, the Utilities shall focus on integrating Assembly Bill 1678 requirements by identifying the LGBTBEs, services, and areas of need for which there are such qualifying LGBTBEs; (b) During the first three years of implementing the attached amended GO 156 upon issuance of this decision and for the 2016, 2017 and 2018 annual reports and plans, the Utilities shall be excused from setting their own numerically-based goals and targets for LGBTBEs and instead focus their efforts on the following foundational and outreach activities; (i) Updating corporate supplier diversity policy to include LGBTBEs and affirming the Utilities' commitment to this policy.(ii) Establishing a process for recruiting and utilizing LGBTBEs. (iii) Integrating LGBTBEs into their corporate talent pool of suppliers. (iv) Working with NGLCC, local chapters, and/or any other groups, as appropriate, in developing an enhanced understanding on how to conduct effective outreach to the LGBTBE community for the Utilities' procurement and supplier diversity staff. (v) Developing targeted outreach programs for LGBTBEs in order to increase their knowledge and participation in the Utilities' Supplier Diversity Program. (vi) Monitoring the progress and effectiveness of the Utilities' targeted outreach programs for LGBTBEs in order to increase their knowledge and participation in the Utilities' Supplier Diversity Program. (vii) Ensuring LGBTBEs suppliers are informed of available technical assistance and capacity building programs for enhancing the supplier's business acumen. (viii) Working with NGLCC, local chapters, and/or any other groups, as appropriate, to identify areas of the Utilities' program where the program is underperforming or underutilized in contracting LGBTBE and continually improving ways to enhance performance and increase the LGBTBE talent pool. (ix) Updating processes, procedures and systems to support LGBTBE inclusion in procurement. (c) For the 2016, 2017 and 2018 annual reports and plans, the Utilities shall prepare and submit the required detailed	3.17.21 - We are in compliance - we along with the Joint Utilities filed recommended LGBT goals on 12/31/20. Cal American Water is in compliance. Cal Am ensures its involvement with the creation of the LGBT goal in 2021. Starting in 2022, LGBT goals will be included in the GO 156 Annual Report.	D. 15-06-007
128	Ongoing	(continued from another section. Search under D.14-08-058) 8. When embarking on a recycled water project, the Investor Owned Water and Sewer Utilities shall explore and take advantage of appropriate opportunities for joint recycled water projects and arrangements with other public water supply and wastewater treatment agencies. To the extent feasible, such activities shall be compatible with Integrated Regional Water Resource planning in the applicable region, and if practicable, each Investor Owned Water and Sewer Utility shall conduct its water supply planning for recycled water in a manner consistent with the relevant portion of the Integrated Regional Water Resource plan for its region. 9. Investor-Owned and Sewer Utility ratepayers shall not assume an unjust or unreasonable share of the recycled water project costs when public and private partnerships are involved. 10. Investor-Owned and Sewer Utilities shall seek opportunities to partner with public agencies or otherwise to identify and secure lower-cost public funding to cover or contribute to the cost of their recycled water projects. 11. The ratemaking treatment of recycled water projects shall be done on a case-by-case basis because of the wide range of variables involved.	To be done as needed. California American water continues to pursue and seek authorization for recycled water projects in its rate case filings.	D. 14-08-058

Item	Status	Compliance Order	Comments	Decision/ Resolution
129	Ongoing	<p>(continued from another section. Search under D.14-08-058) 12. The ratemaking treatment of recycled water project costs shall consider all the costs and benefits the project will provide for IOWSU customers in the service area and region where the project will be implemented. 13. The ratemaking treatment of recycled water projects shall include a determination of how the recycled water project costs should be allocated between the Investor-Owned Water and Sewer Utilities' potable and recycled water customers, and whether those costs should be recovered through the general metered service rates or a surcharge. 16. As part of the Minimum Criteria Requirements the Investor-Owned Water and Sewer Utilities shall provide information on a) The current cost, availability and demand for both potable and recycled water supplies in the Investor-Owned Water and Sewer Utilities' service area where the project is being proposed; b) the potential demand for the proposed project's recycled water supply by prospective customers; and c) the factors used or considered in setting the recycled water incentives, including wholesaler discounts and/or assistance with customers retrofit costs. If the discounts provided for in the above paragraphs are greater than the water utility's reduction in costs, the water utility may include the aggregate amount of that discount in its revenue requirement to be applied to, and recovered in, rates that are applicable to all general metered customers.</p>	<p>CAW has updated its uniform system of accounts to reflect the recycled water accounts and other provisions of D.14-08-058. Cal Am is currently not engaged in a recycled water program. These provisions will be used if and when Cal Am becomes involved in a recycled water project.</p>	D. 14-08-058
130	Ongoing	<p>(continued from another section. Search under D.14-08-058) 17. Recycled water project costs shall be allocated using each Investor-Owned Water and Sewer Utilities' adopted cost allocation criteria from its most recent GRC for the service area where the project will be implemented. 18. The Investor-Owned Water and Sewer Utilities must make a showing that demonstrates to the Commission's satisfaction the prudence of each recycled water project and reasonableness of the associated costs specified in the minimum criteria requirements prior to recovery of recycled water project costs from metered service customerse. The aforementioned showing must include a cost-benefit analysis for new recycled water projects. 19. When an Investor-Owned Water and Sewer Utility undertakes a recycled water project, it shall identify and review consumer education materials and methods that are available industry-wide, and, where appropriate, take reasonable steps with any public agency partners to utilize existing resources before developing duplicative or more costly materials. The IOWSUs shall include with their recycled water proposals, information on the consumer education materials and methods they will use to educate customers about the benefits associated with the use of recycled water. 20. To qualify for the Tier 3 Advice Letter process a proposed recycled water project shall (1) Be required to have a revenue impact of less than 5% of the proposing Investor-Owned Water and Sewer Utilities' revenue requirement in the associated ratemaking area; (2) be exempt from review under the National Environmental Protection Act (NEPA) or California Environmental Quality Act (CEQA), or the lead agency must have completed and certified NEPA/CEQUA review for the proposed project; and (3) not require direct potable water reuse as defined by Water Code Sections 13560 et.seq.</p>	<p>To be done as needed. California American water continues to pursue and seek authorization for recycled water projects in its rate case filings. Though long in the making, projects in the Los Angeles, San Diego, and Sacramento districts hold promise, have been discussed in prior rate case testimony and will continue to be brought forward.</p>	D. 14-08-058
131	Completed	<p>2. California-American Water Company (Cal-Am) shall participate in each Monterey Regional Water Pollution Control Agency (Agency) and Monterey Peninsula Water Management District (District) rate proceeding involving the Revised Water Purchase Agreement (WPA). Cal-Am shall serve written comments to the Agency and District in that rate proceeding. The written comments shall state any and all concerns of Cal-Am with Agency and District proposals, and provide alternative recommendations. If Cal-Am has no concerns, the written comments shall state it has no concerns. At the time Cal-Am serves its comments on the Agency and District, it shall simultaneously serve a copy of the comments on the Commission's Director of the Division of Water and Audits.</p>	<p>The WPA purchase agreement was approved by the CPUC in D.16-09-021 and this item is closed.</p>	D. 16-09-021
132	Completed	<p>2. Future Water Revenue Adjustment Mechanism/Modified Cost Balancing Account (WRAM/MCBA) advice letters filed and served by California-American Water Company (Cal-Am) for the Monterey District shall request recovery of under-collections (or refunds of over-collections) by a uniform surcharge (or surcredit) on each unit of water sold (volumetric rate) including Tier 1. This applies to all WRAM/MCBA balances recovered once the new rate design is implemented. Cal-Am shall provide customer notice of each such advice letter consistent with General Order (GO) 96-B. In addition, for each of the next three advice letter requests, Cal-Am shall notify all customers in the Monterey District by bill insert or direct mail of the request even if that notice is not otherwise required by GO 96-B. The Notice shall be approved by the Commission's Public Advisor before it is issued by Cal-Am.</p>	<p>AL 1199 was filed on March 30, 2018; AL 1265 was filed on March September 23, 2019; AL 1329 was filed on March 31, 2021; and AL 1365 was filed on March 18, 2022 reflecting changes associated with the uniform surcharge. ALs have complied with this order.</p>	D. 16-12-003

Item	Status	Compliance Order	Comments	Decision/ Resolution
133	Completed	4. California-American Water Company shall study the following issue and report its findings along with its recommendations in Application 16-07-002. The issue is the potential for automatic enrollment in the low-income ratepayer assistance program, along with coordination with energy utilities, municipalities, and community based organizations to provide conservation information and tools to its customers.	California American Water has partnered with PGE to offer one of the first large scale Water/Energy direct install program to low income customers and has collaborated with other Energy utilities to offer joint conservation programs to its low income customers.	D. 16-12-003
134	Completed	8. California-American Water Company (CalAm) is authorized to recover \$37,692.15 in pre-settlement transaction costs in its future rate base as part of CalAm's soon-to-be filed general rate case (expected to begin in 2018).	The transaction costs were approved for recovery in D.21-11-018.	D. 16-11-014
135	Completed	3. California-American Water Company (Cal-Am) must file a copy of the operating permit from the State Water Resources Control Board, Division of Drinking Water referenced in Ordering Paragraph No. 1 as a compliance filing in this docket within 30 days of receipt of such authority. Cal-Am shall verify that Meadowbrook Water Company of Merced, Inc. has paid its Commission User Fees for 2016 to the Commission's Fiscal Office. The filing of these compliance filings will not reopen the record of this proceeding.	CAW made the compliance filing for Meadowbrook's 2016 Commission User Fees on 6-6-18. Meadowbrook Water Company of Merced's Commission User Fees for 2016 to the Commission's Fiscal Office were paid.	D. 16-12-014
136	Completed	2. Class A and B water Investor-Owned Utilities shall propose improved forecast methodologies in their General Rate Case application, or in standalone, separate applications, following the effective date of this decision to more accurately determine how authorized revenue determined in a General Rate Case will be collected through water rates, and shall consider consumption trends during and following the drought that began in 2013, and factors that may affect consumption in the next General Rate Case such as drought, flood, climate change, water supply, any proposals to shift the collection of rates to fixed as opposed to variable charges, and the transition to Advanced Metering Infrastructure.	CAW proposals to address compliance and achieve balanced rates, affordability, conservation, rate recovery and sales forecasting will be included in the 2022 GRC filing. MCubed provided updated sales forecasting methodologies in the 2022 GRC in the testimony of David Mitchell.	D. 16-12-026
137	Completed	3. Class A and B Water Investor-Owned Utilities that have a five percent or greater divergence (higher or lower) between authorized and actual sales during a drought period in their current General Rate Case cycle, shall consider filing for an individual district or several districts a Tier 2 Advice Letter requesting a Sales Reconciliation Method to conform water forecasts authorized in the current General Rate Case to actual consumption, in light of the drought and circumstances faced in their district(s).	D.21-11-018 adopted a settlement agreement that authorized CAW to incorporate the existing ACAM mechanism in the Monterey District per the joint settlement of CAW, Cal Advocates and MPWMD in A.15-07-019 and to incorporate the adjustment as part of the step and attrition filings for all districts, excluding the Fruitridge sub- system in the Northern Division, for 2022 and 2023 and for setting test year rates for the Monterey District.	D. 16-12-026
138	Completed	4. Except where Sales Reconciliation Mechanism (SRM) has already been authorized, Class A and B Water Investor-Owned Utilities may file in the next General Rate Case application following this Decision a proposal to institute an SRM that puts at least 50 percent of the divergence between authorized and actual sales in rates to be recovered through the remainder of the General Rate Case cycle, or alternative mechanisms to reduce Water Revenue Adjustment Mechanism balances and surcharges, and provide timely cost information to customers.	D.21-11-018 adopted a settlement authorizing CAW to incorporate the existing ACAM mechanism in the Monterey District per the joint settlement of CAW, Cal Advocates and MPWMD in A.15-07-019 and to incorporate the adjustment as part of the step and attrition filings for all districts, excluding the Fruitridge sub- system in the Northern Division, for 2022 and 2023 and for setting test year rates for the Monterey District.	D. 16-12-026
139	Completed	5. Class A and B water utilities shall consider proposing pilot programs in their next General Rate Case application to implement very high tiered rates, a superuser charge, or other mechanisms to enable the utility to provide clear conservation signals to outlier users.	CAW addressed this issue in the testimony of MCubed and Bahman Pourtaherian in its 2019 GRC.	D. 16-12-026
140	Completed	6. Class A and B water utilities shall propose pilot programs in their next General Rate Case application, or in a separate, standalone application, to adjust tiers, impose a superuser charge, or deploy other mechanisms taking into account other rate design changes and deployment of Advanced Metering Infrastructure to promote conservation, rate recovery, cost-based rates, and equity, providing analysis and a showing to allow the Commission to evaluate the likely effectiveness of those proposals.	The AMI project was approved in D.21-11-018 and is scheduled to be rolled out beginning in 2023. The testimony of Garry Hofer contains updates to the AMI project, which is now centered on the use of cellular data service rather than fixed networks.	D. 16-12-026
141	Completed	7. Class A and Class B water utility Advanced Metering Infrastructure (AMI) proposals currently before the Commission shall receive due consideration. Class A and Class B water utilities shall consider filing, in the General Rate Case or in a standalone, separate application, proposals for Commission consideration to deploy AMI when converting flat rate customers to metered customers, for replacement of obsolete or damaged meters, and for meters in new construction. In districts or areas where the existing or anticipated communications infrastructure and other factors indicate that Advanced Meter Reading (AMR) would be substantially more cost-effective than AMI, Class A and B water utilities may deploy AMR to such customers if comparable leak detection and data communication benefits can be achieved. The Commission will decide on the appropriateness of Class A and B water utility proposals in the respective General Rate Cases or standalone applications.	The AMI project was approved in D.21-11-018 and is scheduled to be rolled out beginning in 2023. The testimony of Garry Hofer contains updates to the AMI project, which is now centered on the use of cellular data service rather than fixed networks.	D. 16-12-026

Item	Status	Compliance Order	Comments	Decision/ Resolution
142	Completed	9. Class A water utility Advanced Metering Infrastructure (AMI) proposals currently before the Commission shall receive due consideration. Class A water utilities shall propose in their next General Rate Case application, or in a separate, standalone application, AMI meters for existing customers, and a schedule to transition existing customers to such meters. Those proposals may identify districts or areas where the existing or anticipated communications infrastructure and other factors indicate that Advanced Meter Reading (AMR) would be substantially more cost-effective than AMI, and deploy AMR if comparable leak detection and data communication benefits can be achieved. Utilities should propose policies consistent with those established in Decision 14-12-078 regarding customers' ability to opt out of AMI meter installations.	The AMI project was approved in D.21-11-018 and is scheduled to be rolled out beginning in 2023. The testimony of Garry Hofer contains updates to the AMI project, which is now centered on the use of cellular data service rather than fixed networks.	D. 16-12-026
143	Completed	11. Class A and Class B water utilities shall propose and provide in their General Rate Case application information and analysis that provides estimates of long run marginal costs based on information about water supplies reasonably likely to be available to that utility and other factors as described in this Decision, and how such costs should be applied in proposed rate designs. We give flexibility to Class A and Class B water utilities to propose rate design that reflects long run marginal cost in all but the bottom tier, only in upper tiers, to target outlier users with extremely high consumption, or alternative mechanisms to address high water consumption, particularly by outlier users.	CAW addresses this requirement with the 2022 GRC Application.	D. 16-12-026
144	Ongoing	12. Class A and B water utilities that seek to adjust their current rate designs and take advantage of the flexibility proposed in this decision shall consider proposing in their General Rate Case applications, or in separate, standalone applications, adjustments to tiered rates to promote conservation, rate recovery, cost-based rates, and equity, providing analysis and a showing to allow the Commission to evaluate the likely effectiveness of those proposals. Such rate design proposals shall propose mechanisms to provide reasonable customer rates and equity for low-income customers, particularly since low-income customers suffer from significant increases in water bills, while providing conservation incentives.	CAW addressed this issue in the testimony of MCubed and Bahman Pourtaherian in its 2019 GRC, with several requested adjustments incorporated into rate design established in D.21-11-018. CAW further intends to address this issue in the 2022 GRC Application.	D. 16-12-026
145	Ongoing	13. Class A and Class B water utilities shall consider proposing in their General Rate Case application adjustments to the percentage of revenue recovery collected from fixed charges with a floor of at least 40 percent of revenues collected from fixed charges and up to 50 percent fixed charges, or submit alternative proposals to reduce reliance on Water Revenue Adjustment Mechanism (WRAM)/Modified Cost Balancing Account balances, maintain an incentive for conservation of water, and address utility circumstances. Such proposals shall consider the impact of shifting revenue recovery to fixed costs on low-income customers and propose appropriate adjustments to low-income programs to maintain affordability and equity, while signaling conservation and reducing reliance on WRAM balances and surcharges.	CAW addressed this issue in the testimony of MCubed and Bahman Pourtaherian in its 2019 GRC, with several requested adjustments incorporated into rate design established in D.21-11-018. CAW further intends to address this issue in the 2022 GRC Application.	D. 16-12-026

Item	Status	Compliance Order	Comments	Decision/ Resolution
146	Ongoing	15. After the date of this Decision, proposed Class A and Class B water utility General Rate Case settlements shall indicate how this Decision and the goals and objectives of Attachment A meet the public interest test for evaluation of settlement proposals. Attachment A Goals and Objectives for Balanced Rate Design 1. Implement the legal requirement that investor owned water utilities provide safe and reliable water supply and delivery at just and reasonable rates. 2. Promote efficient use of water, promptly identify and fix water leaks, and reduce the incidents of system and customer water leaks, consistent with state law. 3. Simplify rate design, customer notices, and customer bills while providing necessary information for customers to make wise choices about their use, and transparent information about water service costs and the regulatory process. 4. Consider in rate design marginal costs including long run marginal costs of anticipated sources of water. 5. Align cost recovery with revenue requirement in balance with the Commission's and the state's public policy goals. 6. Provide protections for low-income customers consistent with the Commission's and state policies. 7. Provide conservation incentives for customers and utilities consistent with the Commission's and state policies. 8. Initiate investment in Advanced Metering Infrastructure (AMI) that will enable both customers and the utilities to observe usage and costs in real time to promote more efficient and effective water conservation and advance water safety such as through prompt identification of backflow incidents that may put water quality at risk. 9. Provide opportunity for timely utility recovery of its revenue requirement. 10. Align utility risk and return in a way that affords the utility an opportunity to attract capital for investment on reasonable terms. 11. Reduce or eliminate the causes of high WRAM/MCBA surcharges and extended recovery periods, including through realigning revenue recovery to increase the percentage of revenues recovered from as compared to variable rates. 12. Improve sales forecasting methodology. 13. Optimally balance investment, conservation, and affordability. 14. Optimally amortize current reasonably incurred balances in WRAM/MCBA and drought-related revenue shortfall mechanisms.	The Settlement Agreement adopted in D.21-11-018 addressed these items as specifically discussed in the Summary of Settlement section	D. 16-12-026
147	Ongoing	Order P. 4. California American Water Company is ordered, as a condition of any future amortization of the National Oceanic and Atmospheric Administration/Endangered Species Act Memorandum Account, to submit a funds utilization report with its next amortization request that lists how all funds paid to the California Department of Fish and Game by California American Water Company have been used for mitigation of the environmental impact on the Carmel River from California American Water Company's operations.	California American Water transferred \$8.4 million in the 2013 GRC to the Consolidated Expense Balancing Account for recovery. AL 929 was filed in January 2012 and was approved by Res W-4912. AL 1133-A was filed in September 2016 to recover subsequent transfers from the NOAA/ESA Memo Account and was approved November 2016. CAW filed AL 1309 in September 2020 (for 2017-2020 recovery) and was approved December 2020. CAW filed AL 1366 in April 2022 (for 2021 recovery) and is pending approval. In 2017, a new contract agreement was put into place for \$1.1 million dollars per year until 2021.	R. W-4912
148	Ongoing	3. The Department and the Water Board shall permanently require urban water suppliers to issue a monthly report on their water usage, amount of conservation achieved, and any enforcement efforts.	Monthly report is being submitted via the SWRCB reporting site	Executive Order B-37-16
149	Completed	6. The Water Board and the Department shall direct urban and agricultural water suppliers to accelerate their data collection, improve water system management, and prioritize capital projects to reduce water waste. The California Public Utilities Commission shall order investor-owned water utilities to accelerate work to minimize leaks.	This information is included in the NRW Report. MDR E.6 contains the Historical Main/Service Leaks for CA for 2011-2015. MDR E.7 contains information on the Leak Detection Program. MDR E.5 contains information on the Meter Replacement Programs	Executive Order B-37-16
150	Ongoing	8. The Department shall strengthen requirements for urban Water Shortage Contingency Plans, which urban water agencies are required to maintain. These updated requirements shall include adequate actions to respond to droughts lasting at least five years, as well as more frequent and severe periods of drought. While remaining customized according to local conditions, the updated requirements shall also create common statewide standards so that these plans can be quickly utilized during this and any future droughts.	New UWMP and WSCP standards became effective for 2020 plans.	Executive Order B-37-16

Item	Status	Compliance Order	Comments	Decision/ Resolution
151	Ongoing	Order P. 1. All Class A water utilities shall comply with the Governor's Executive Order B-37-16 by accelerating actions to minimize leaks and keeping non-revenue water percentages stable. Actions that shall be proposed by investor-owned utilities to reduce non-revenue water and minimize leaks include, but are not limited to: water loss audits; accelerated meter and main replacement programs; increased inspections of service connection meters and mains; installation of leak-detection sensors in the distribution system; timely and efficient pipeline repairs; pressure management; and deployment of advanced meter infrastructure (AMI). These actions should be reviewed in each utility's upcoming general rate case or by separate applications.	California maintains a robust non revenue water loss reduction program, whose details are in the NRW Report. MDR E.6 contains the Historical Main/Service Leaks for CA for 2011-2015. MDR E.7 contains information on the Leak Detection Program. MDR E.5 contains information on the Meter Replacement Programs. The AMI project was approved in D.21-11-018 and is scheduled to be rolled out beginning in 2023. The testimony of [TBD!!!!] contains updates to the AMI project, which is now centered on the use of cellular data service rather than fixed networks.	R. W-5119
152	Ongoing	Order P. 7. All water utilities shall comply with all monitoring and reporting requirements as established by the State Water Resources Control Board.	CAW is complying with all monitoring and reporting requirements as per Order P.7 of Resolution W-5103	R. W-5103 - Option A
153	Ongoing	Order P. 4. All water utilities shall comply with all monitoring and reporting requirements as established by the State Water Resources Control Board.	CAW is complying with all SWRCB established monitoring and reporting requirements.	R. W-5082
154	Completed	Order P. 2. All California Public Utilities Commission jurisdictional water utilities shall notify their customers through a bill insert, e-mail or text message of the State Water Resources Control Board's enactment of mandatory water use restrictions and fines for violations as codified in Title 23, Section 864 of the California Code of Regulations, re-adopted on March 17, 2015, in Resolution 2015-0015, as well as the new prohibited water uses enacted for 2015.	CAW notified its customers as per Ordering paragraph 2 of R. W-5034. This compliance item is no longer applicable.	R. W-5034
155	Completed	Order P. 4. All Class A and B water utilities shall, at a minimum, establish procedures and mechanisms that facilitate reporting of employee- and customer-identified violations and the conveyance of this information to the appropriate enforcement officials. These utilities shall track and record reports of violations, actions taken to assist local law enforcement or public agencies, and the results of such actions. This information shall be made available to the Commission upon request.	CAW implemented several ways for customers to report violations including a smart phone app and a website reporting tool. This compliance item is no longer applicable.	R. W-5034
156	Completed	Order P. 5. All Class A and B utilities are required to provide a copy of the monthly monitoring report on water production, as required by the State Water Resources Control Board's enactment of Section 865(d) in Title 23, of the California Code of Regulations, to the Director of the Division of Water and Audits as long as these reports are required by the State Water Resources Control Board.	CAW has provided copies of the monthly monitoring report to the Director of Water and Audits. This has been replaced by the new conservation framework legislation.	R. W-5034
157	Ongoing	Order P. 1. The disinfection requirement of main(s) established in the Minimum Standards of Repairs Section II.3.C.5 of General Order (GO) 103-A is revised as follows delete "disinfection of mains, and the Department's or County Health's permission to return the line to service;" and insert in its place "water mains that have been taken out of service for maintenance or repair shall be disinfected and sampled for bacteriological quality in accordance with AWWA Standard C651-05;"	California American Water remains in compliance with the conditions explained in this language change.	R. W-4823
158	Ongoing	Order P. 2. Section IV.1.A is revised as follows delete "Consistent with the requirements of Public Utilities Code Section 781, which generally requires the Commission to hold a hearing and make certain findings before customers who were unmetered on January 1, 1979 can be required to have a meter, all water provided by a utility shall be metered, except that the utility may, after authorization has been obtained from the Commission, provide flat rate or estimated service." insert in its place "Consistent with the requirements of Public Utilities Code Section 781.5, all water provided by a utility shall be metered, except that the utility may, after authorization has been obtained from the Commission, provide flat rate or estimated service, if permitted by Public Utilities Code Section 781."	The vast majority water services in California American Water are metered. The only exceptions would be related to new acquisitions that were unmetered when acquired. A plan for the metering of those systems would be in place and the CPUC would be aware of those exceptions.	R. W-4823
159	Completed	Order P. 1. Ordering Paragraph 3 of Decision 16-12-026 (as shown in Attachments A and B) is changed to read as follows Class A and B Water Investor-Owned Utilities that have a five percent or greater divergence (higher or lower) between authorized and actual sales during a drought period in their current General Rate Case cycle, shall consider filing for an individual district or several districts a Tier 2 Advice Letter requesting a Sales Reconciliation Mechanism to conform water forecasts authorized in the current General Rate Case to actual consumption, in light of the drought and circumstances faced in their district(s).	D.21-11-018 adopted a settlement agreement that authorized CAW to incorporate the existing ACAM mechanism in the Monterey District per the joint settlement of CAW, Cal Advocates and MPWMD in A.15-07-019 and to incorporate the adjustment as part of the step and attrition filings for all districts, excluding the Fruitridge sub- system in the Northern Division, for 2022 and 2023 and for setting test year rates for the Monterey District.	D. 17-04-002

Item	Status	Compliance Order	Comments	Decision/ Resolution
160	Ongoing	Order P. 1. For General Rate Case or separate, stand-alone applications following the effective date of this Decision, Class A and Class B water utilities shall consider proposing rate designs which implement the various changes discussed herein.	CAW addressed this issue in the testimony of MCubed and Bahman Pourtaherian in its 2019 GRC, with several requested adjustments incorporated into rate design established in D.21-11-018. CAW further intends to address this issue in the 2022 GRC Application.	D. 16-12-026
161	Ongoing	Order P. 10. Water corporations are authorized to establish memorandum accounts to record expenses incurred for water-energy nexus projects through a Tier 1 advice letter filing. Water corporations may seek recovery of expenses booked to these memorandum accounts through a Tier 3 advice letter, or in their next respective general rate case filing.	Cal Am filed AL 1113 establishing this memorandum account. AL 1113 was approved March 7, 2016. A zero balance and keeping the account open were stipulated to by parties in A.16-07-002 and as outlined in D.18-12-021; and in A.19-07-004 and in D.21-11-018.	D. 15-09-023
162	Completed	Order P. 9. Once the Utilities' proposed updated form ordered in Ordering Paragraph No. 8 of this decision, which updates the Attachment C to this decision, is approved by the Commission staff in writing, the each electrical, gas, water, wireless telecommunications service provider, and telephone corporation with gross annual revenues exceeding twenty-five million dollars (\$25,000,000) and their commission-regulated subsidiaries and affiliates shall submit their annual reports itemizing women-owned, minority-owned, disabled veteran-owned and lesbian, gay, bisexual and/or transgender person-owned business enterprise program expenses pursuant to Section 9.1.3 of the amended General Order 156 and do so using that approved and updated form of the report.	Cal American Water is in compliance with the Joint Utilities filed recommended LGBT goals on 12/31/20. Cal Am ensures its involvement with the creation of the LGBT goal in 2021. Starting in 2022, LGBT goals will be included in the GO 156 Annual Report.	D. 15-06-007
163	Completed	Order P. 2. California-American Water Company shall consult with the Commission's Public Advisor regarding the customer notices and community outreach in Section 4.8 of the Phase 3A Settlement Agreement.	Meetings occurred on Wednesday, May 8 and Thursday, May 9, at 6 pm. CAW coordinated with the PAO on the notice and also on the public meetings by sharing our plans for the meetings and sought PAO input on the format. CAW also provided a follow up email to the PAO after the meetings to let them know of the attendance, how the meetings went and any feedback on the notice itself, which the PAO had specifically requested.	D. 18-05-027
164	Ongoing	Order P. 13. General Order 77-M is modified to require all statements required under the General Order to be filed with the Commission on or before May 31 of each and every year.	California American Water includes GO-77-M reporting in its Annual Report filing to the Division of Water and Audits. The most recent filing was for the year ended December 31, 2021 and was filed June 15, 2022	D. 17-09-006
165	Ongoing	Order P. 2. Cal-Am shall diligently implement actions to terminate its unlawful diversions from the Carmel River and shall terminate all unlawful diversions from the river no later than December 31, 2021. This date supersedes the December 31, 2016 date in State Water Board Order WR 2009-0060, ordering paragraph 1.	The desal plant will not be complete by end of 2021 nor will the M1W PWM expansion project. Therefore, after end of 2021, we have banked/stored water in Seaside basin that will help to supplement supplies to meet demand for one or two years. After which, a new supply is needed. If no water supply is approved and online, over pumping of the Seaside Basin may occur in-lieu of the Carmel River.	SWRCB R. 2016-0040

Item	Status	Compliance Order	Comments	Decision/ Resolution
166	Ongoing	<p>Order P. 3. Effective Diversion Limit. Cal-Am shall adjust its diversions from the Carmel River in accordance with the following terms and conditions. These terms and conditions supersede the annual reductions in State Water Board Order 2009-0060, ordering paragraph 3.a.(2), after the effective date of this Order.</p> <p>a. Effective Diversion Limit The limit set forth in this Condition 3.a., as may be further reduced or increased pursuant to the terms and conditions of this Order, is referred to as the "Effective Diversion Limit." i. Immediate Reduction Commencing on October 1, 2015 (Water Year 2015-2016) the Effective Diversion Limit shall be 8,310 acre-feet per annum (afa). This Effective Diversion Limit shall not be exceeded through December 31, 2021 except as provided in condition 3.b.ii or 3.c. of this Order. This limit supersedes the reduction limit required under Order 2009-0060 for Water Year 2015-2016. b. Adjustments to the Effective Diversion Limit i. Pure Water Monterey Groundwater Replenishment Project Offset In any year that Cal-Am delivers water stored in the Seaside Groundwater Basin as part of the Pure Water Monterey Groundwater Replenishment Project to its customers for use, the Effective Diversion Limit shall be reduced by one acre foot for every acre foot of Pure Water Monterey Groundwater Replenishment Project Water so delivered. If this reduction will result in the Effective Diversion Limit for that year being lower than Cal-Am's available lawful diversions from the Carmel River in that year, Cal-Am may apply to the Deputy Director for a limitation of this condition such that the provision will not limit lawful diversions. ii. Seaside Groundwater Basin Limitations The Board may adjust the Effective Diversion Limit if an unexpected reduction in Cal-Am's production allocation from the Seaside Groundwater Basin, or access to water pumped makes the supply unavailable. The Applicants¹⁶ may request such relief whenever they can establish that access to water in the Seaside Groundwater Basin is limited due to unexpected mitigation measures imposed pursuant to the Seaside Basin Watermaster's Seawater Intrusion Response Plan, or by the court pursuant to the Seaside Groundwater Basin Judgment in response to a detection of seawater intrusion within the Seaside Groundwater Basin. iii. Carryover After October 1, 2015 if Cal-Am's diversions from the Carmel River during a given water year are less than the Effective Diversion Limit for that water year, Cal-Am will accumulate credit for the difference between the Effective Diversion Limit and Cal-Am's actual diversions. Additionally, Cal-Am may generate credits through instream flow agreements, as described in 3.b.xii, below. Any such credit may be carried over to offset an</p>	California American Water is in compliance with this order.	SWRCB R. 2016-0040
167	Ongoing	<p>Order P. 4. Status of Steelhead Fishery Report. During the extension period Cal-Am will provide funding in an amount up to \$175,000 per year for the preparation of an annual report that evaluates the status of the threatened South-Central California Coast Steelhead Distinct Population Segment ("SCCC Steelhead DPS") in the Carmel River ("Status of Steelhead Fishery Report"). If possible, the annual Status of the Steelhead Fishery Report will be prepared by the National Marine Fisheries Science ("NMFS") Southwest Fisheries Science Center ("SWFSC"). If NMFS West Coast Region finds a significant change in the status of the SCCC Steelhead DPS since the previous report (or, in the case of the first report, since the effective date of this Order), NMFS West Coast Region may provide recommendations for additional adaptive management measures to be taken with respect to the SCCC Steelhead DPS in the Carmel River. If SWFSC cannot complete the Status of the Steelhead Fishery Report for any or all years during the extension period, Cal-Am will designate another individual or entity, in consultation with the other Applicants and other stakeholders, with requisite expertise to complete the report. If NMFS objects to the choice, Cal-Am shall designate a different individual or entity. If the NMFS West Coast Region cannot review the Status of the Steelhead Fishery report in any or all years, Applicants and other stakeholders may develop an alternative system for making adaptive management recommendations. Cal-Am will deliver the report in a cost effective and efficient manner, and will work with Applicants, stakeholders, and the preparer of the Status of the Steelhead Fishery Report to share resources, and to avoid duplication of effort to lower the cost of the report to the extent practicable. The Status of the Steelhead Fishery Report and any adaptive management recommendations shall be submitted to the State Water Board by Cal-Am each year with the corresponding joint annual report.</p>	California American Water is in compliance with this order.	SWRCB R. 2016-0040

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168	Ongoing	Order P. 5. Additional Conservation Measures Cal-Am has stated that it will implement an additional \$2.5 million of projects to improve fish passage and habitat during the four years following adoption of this Order, as follows improvements to the existing upstream fish passage ladder and trap at Los Padres Dam (\$0.2 million); installation of a fish screen at the lower outlet pipe on Los Padres Dam (\$0.8 million); a pit tagging program (\$1.0 million); and a through-reservoir survival study for Los Padres Reservoir (\$0.5 million). If the above projects are not implemented according to plans developed in coordination with the California Department of Fish and Wildlife and the National Oceanic and Atmospheric Administration, the State Water Board may revisit this Order to determine whether to make further adjustments to protect public trust resources in the Carmel River.	All projects identified by this order are in-progress or in planning/permitting towards implementation.	SWRCB R. 2016-0040
169	Ongoing	Order P. 7. On June 1 of each year, Cal-Am shall submit an operating plan to the Deputy Director for Water Rights specifying the quantity of water it will supply from the ASR Project for its customers after May 31 of each year. This plan shall provide for use of the water between June 1 and September 30 of the water year the water was pumped from the Carmel River, unless otherwise authorized by the fishery agencies. Cal-Am shall reduce its illegal diversions from the Carmel River at the same rate ASR water is recovered from the groundwater basin. ASR diversions remain subject to State Water Board Order WR 2009-0060, ordering paragraph 3.c. This section supersedes ordering paragraph 4 of WRO 2009-0060.	CAW is compliance with this order.	SWRCB R. 2016-0040
170	Completed	Order P. 8. In addition to the reporting required elsewhere in this order or required under WRO 2009-0060 ordering paragraph 6, except as specified, Cal-Am shall provide and post on its website the following information in quarterly reports a. Monthly summaries of the total quantity of water produced from the Carmel River, and other separate sources of water used by Cal-Am within the service area. b. Monthly summaries of the total quantity of ASR project water diverted from the river under water right Permits 20808A and 20808C and stored in the Seaside Groundwater Basin, including the separate accounting of the amounts pumped in excess of 600 afa. The monthly reporting shall also state the quantity of ASR water recovered from aquifer storage and beneficially used, and the current balance of ASR water remaining in storage in the Seaside Groundwater basin. This paragraph supersedes WRO 2009-0060, ordering paragraph 6.(b). c. Monthly summaries of the quantity of water being supplied by the Malpasos Water Company to Cal-Am and to Malpasos customers supplied using Cal-Am facilities. The reporting shall identify the amount of water used at Cal-Am's existing meter connections and within the Cal-Am service area, and the amounts used at new service connections served by Malpasos Water Company. The monthly reports shall specify the quantity of water used to reduce diversions from the river during the reporting period. d. Monthly summaries of the quantity of water produced by the City of Pacific Grove, and the quantity of water used to reduce diversions from the river during the reporting period. Cal-Am shall not deliver water produced by the City of Pacific Grove unless such use is consistent with Resolution 2015-0070, paragraph 4. e. For the final quarter of each water year, the report shall include the quantification and basis of any credits earned and of any amount being carried over for future years. f. An accounting of the progress towards completion of the Water Supply Project MPWSP Desalination Plant and Pure Water Monterey Project that identifies all progressive steps completed during the previous 12 months and the upcoming 12 month's anticipated progress, and discussion of potential setbacks that may beyond the Applicant's control.	SWRCB CDO WR 2016-0016 and WR 2009-0060 Quarterly reports containing requested information are posted online at https://amwater.com/caaw/customer-service-billing/billing-payment-info/water-rates/monterey-district	SWRCB R. 2016-0040
171	Ongoing	Order P. 10. Each report submitted by Cal-Am shall be certified under penalty of perjury and shall include the following declaration "I declare under penalty of perjury, under the laws of the State of California, that all statements contained in this report and any accompanying documents are true and correct, with full knowledge that all statements made in this report are subject to investigation and that any false or dishonest statement may be grounds for prosecution."	Agree	SWRCB R. 2016-0040
172	Ongoing	Order P. 11. Cal-Am shall file quarterly reports of its diversions under Paragraph 5 (small project implementation) of State Water Board Order WR 2009-0060. This section corrects an error in State Water Board Order WR 2009-0060 ordering paragraph 7, which incorrectly identified the relevant paragraph as State Water Board Order WR 2009-0060 ordering paragraph 3.	No action required	SWRCB R. 2016-0040
173	Ongoing	Order P. 13. Cal-Am shall comply with all requirements of State Water Board Order 95-10, except as provided in State Water Board Order WR 2009-0060, ordering paragraph 9, or except as inconsistent with this Order.	Cal-Am is in compliance with SWRCB Order 95-10 and its subsequent amendments.	SWRCB R. 2016-0040

Item	Status	Compliance Order	Comments	Decision/ Resolution
174	Ongoing	Order P. 15. The conditions of this Order, State Water Board Order WR 2009-0060 and State Water Board Order 95-10 shall remain in effect until (a) Cal-Am certifies, with supporting documentation, that it has obtained a permanent supply of water that has been substituted for the water illegally diverted from the Carmel River and (b) the Deputy Director for Water Rights concurs, in writing, with the certification.	Pending commencement of desal plant.	SWRCB R. 2016-0040
175	Ongoing	Order P. 1. California-American Water Company shall apply the proceeds of the indebtedness authorized herein for the purposes specified in the Application and discussed in this order.	As of April 2022, we have used \$165,003,000 of the \$359,450,000. We plan to issue another \$142,200,000 in May 2021 which will leave \$52,247,000 of authority remaining. In addition, we issued \$40,000,000 in May 2022, so there is only \$12,247,000 remaining. As such, we will need to file a new financing application.	D. 18-07-013
176	Ongoing	Order P. 2. California-American Water Company shall maintain records to identify the specific long-term debt issued pursuant to this order and demonstrate that the proceeds from such debt have been used only for public utility purposes.	Done, this is demonstrated through our semi-annual GO 24-C filings.	D. 18-07-013
177	Completed	Order P. 3. California-American Water Company is authorized to issue new Debt Securities of \$359.45 million a. Pursuant to its Financial Service Agreement with American Water Capital Corporation (Capital Corp.); b. For terms of 1 to 30 years; c. In the forms of unsecured debt issued by Capital Corp. and tax-exempt financing; d. With interest rates determined by market conditions; e. With no taxes assumed by issuer on Debt Securities; f. On an unsecured basis; g. Include no maintenance and depreciation requirements unless the borrowings are made on a tax-free basis; and h. The Debt Securities reflect the Sinking and Other Fund terms obtained by Capital Corp. from its lenders.	During 2018, CAW issued the first \$85M of the \$359.45M. \$30M was issued in 2019 and \$15M in 2020. \$35M was also refinanced in 2020. As of April 2021, we have used \$165,003,000 of the \$359,450,000. We plan to issue another \$142,200,000 in May 2021 which will leave \$52,247,000 of authority remaining as of April 2022. In May 2022, we issued another \$40,000,000 of long-term debt so there is only \$12,247,000 remaining. As such, we will need to file a new financing application for future issuances.	D. 18-07-013
178	Open	Order P. 4. California-American Water Company is authorized to utilize the following debt securities enhancement and interest rate management features in compliance with the New Financing Rule put options; call option (call premium); sinking fund; hedging, including - fund today, price later strategies (such as long hedges, treasury options, interest rate swaps), price today, fund later strategies (including treasury locks, treasury options, interest rate swaps); spread locks; spread options; swaptions; caps and collars; credit enhancements; capital replacements; interest deferrals; and delayed drawdowns.	Noted. No action required.	D. 18-07-013
179	Ongoing	Order P. 4. In the event the Governor of California declares a state of emergency because a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service, regulated water and sewer utilities shall file a Tier 1 advice letter within 15 days reporting compliance with Resolutions M-4833 and M-4835 pursuant to this Decision and costs of lost revenues may be included in the appropriate Catastrophic Even Memorandum Account.	Cal Am will comply with this order when this type of event occurs.	D. 18-08-004
180	Ongoing	Ordering P. 2. California-American Water Company is granted a Certificate of Public Convenience and Necessity for the Monterey Peninsula Water Supply Project (Alternative 5a), subject to California-American Water Company complying with all feasible mitigation measures identified in the combined Final Environmental Report/Environmental Impact Statement, as set forth and in compliance with the Mitigation Monitoring and Reporting Program contained in Appendix D of this decision.	The MMRP is being prepared for implementation prior to construction and will be followed during construction.	D. 18-09-017
181	Ongoing	Ordering P. 7. The Mitigation Monitoring and Reporting Program set forth at Appendix D is adopted.	The MMRP is being prepared for implementation prior to construction and will be followed during construction.	D. 18-09-017
182	Ongoing	Ordering P. 8. California-American Water Company shall implement the environmentally superior alternative (Alternative 5a) of the Monterey Peninsula Water Supply Project identified in the Final Environmental Impact Report.	Pending permits and completion of project.	D. 18-09-017

Item	Status	Compliance Order	Comments	Decision/ Resolution
183	Ongoing	Ordering P. 9. The Return Water Settlement Agreement, filed on June 14, 2016, is approved, subject to the condition that if the return water obligation is greater than the benchmark of an average of six percent (6%) between years 0-7; four percent (4%) between years 8-15; or 1.5% annually from year 16 forward it will be presumed unreasonable. Ratepayers will not be expected to bear any costs for meeting the return obligation above these amounts. Cal-Am may present information to rebut this presumption, keeping in mind that the Commission may also look at the reasonableness of the return water amount and costs to ratepayers at other times as necessary to ensure the return water obligation being met is reasonable and consistent with the estimates provided in the proceeding to support approval of the MPWSP.	The Commission approved the Return Water Settlement Agreement as a part of D.18-09-017. CAW will comply with this order once the plant is operational.	D. 18-09-017
184	Ongoing	Ordering P. 10. Consistent with the understanding that the Commission retains authority to determine appropriate mitigation, compliance, and enforcement as to measures concerning environmental protection pursuant and with respect to California Environmental Quality Act, the Brine Discharge Settlement Agreement, filed on June 14, 2016, and as updated on July 1, 2016, is adopted.	Pending completion and long-term operation of the project	D. 18-09-017
185	Ongoing	Ordering P. 13. California-American Water Company shall comply with all orders and directives of the Executive Director concerning implementation of the environmental mitigation measures described in the Monitoring and Reporting Program.	Ongoing technical team meetings are taking place with CPUC water division and their consultant ESA along with CAW and its consultants to develop the reporting framework. The most recent meeting took place on June 17, 2019.	D. 18-09-017
186	Ongoing	Ordering P. 14. The Executive Director shall not authorize California-American Water Company (Cal-Am) to commence actual construction until Cal-Am has entered into a cost reimbursement agreement with the Commission for the recovery of the costs of complying with the Monitoring and Reporting Program set forth at Appendix D including, but not limited to, special studies, outside staff, or Commission staff costs directly attributable to mitigation monitoring.	The Commission approved the Return Water Settlement Agreement as a part of D.18-09-017. CAW will comply with this order once the plant is operational.	D. 18-09-017
187	Ongoing	Ordering P. 16. California-American Water Company shall submit a Tier 2 advice letter to reflect the service area extensions set out in Section 5 of the Return Water Settlement to provide water to Castroville Community Services District and Castroville Seawater Intrusion Project.	CAW will comply with this order as required once the construction of the plant is complete	D. 18-09-017
188	Ongoing	Ordering P. 17. Beginning January 1, 2019, California-American Water Company shall submit quarterly status reports on the permitting, financing, design, bidding, and construction of the Monterey Peninsula Water Supply Project to the Executive Director and to the Director of the Public Advocates Office, and publish the reports on a company maintained web site dedicated to the project.	In compliance	D. 18-09-017
189	Ongoing	Ordering P. 18. California-American Water Company shall meet quarterly with staff of the Public Advocates Office and Commission Water Division during the period prior to the plant going into operation and up until at least six (6) months after the date that the Monterey Peninsula Water Supply Project becomes operational.	Project is delayed due to permitting with Coastal Commission. Meetings are not taking place until permits are in place to start construction on project.	D. 18-09-017
190	Ongoing	Ordering P. 19. Beginning with the commencement of operation of the Monterey Peninsula Water Supply Project and continuing until otherwise directed to stop, California-American Water Company shall submit regular quarterly filings to the Public Advocates Office (Cal PA) and Water Division as to the volume of water delivered to customers, capacity that the MPWSP is operating, amount of return water needed to meet Cal-Am's obligation, and whether and why the facility has been offline for any reason. These filings shall be served on the Directors of the Cal PA and Water Division, and published on a company maintained web site dedicated to the project.	Not applicable until commencement of plant operations	D. 18-09-017
191	Completed	Ordering P. 20. Rate recovery for any Operations and Maintenance expenditures will be authorized consistent with the framework set forth in Section 8 of the Comprehensive Settlement.	CAW received approval for AL 1220-A in Res W-5211 on 12/27/2019.	D. 18-09-017

Item	Status	Compliance Order	Comments	Decision/ Resolution
192	Ongoing	Ordering P. 21. The cost cap for the MPWSP and the remaining California-American Water Company (Cal-Am) Only Facilities is \$279.1 million excluding the amounts authorized in D.16-09-021. To expend funds that Cal-Am intends to recover from ratepayers beyond the capital cost cap, Cal-Am must file a petition to modify this decision.	CAW has not exceeded the cost cap and has not triggered the requirement for a petition to modify this decision.	D. 18-09-017
193	Ongoing	Ordering P. 22. The Commission's Energy Division may approve requests by California-American Water Company for minor project refinements that may be necessary due to the final engineering of the project, so long as such minor project refinements are located within the geographic boundary of the study area of the Environmental Impact Report/Environmental Impact Statement and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final Environmental Impact Report/Environmental Impact Statement; substantively conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement. California-American Water Company shall seek any other project refinements by a petition to modify today's decision.	We will comply with this order if and when necessary; there is no applicability at this time	D. 18-09-017
194	Completed	Ordering P. 23. The Construction Funding Charge set forth in this decision is authorized consistent with this decision and the provisions that will be included in the Tier 3 advice letter adjusting the framework set out in the Comprehensive Settlement Agreement.	CAW received approval for AL 1220-A in Res W-5211 on 12/27/2019.	D. 18-09-017
195	Completed	Ordering P. 24. California-American Water Company shall file an application with the Commission requesting issuance of a financing order to allow for the securitization financing option consistent with this decision.	CAW continues to work to receive all required approvals and construction of the project with associated financing application to proceed as required.	D. 18-09-017
196	Completed	Ordering P. 25. California-American Water Company shall submit a Tier 3 advice letter to the Commission that provides for specific adjustments to the framework set out in sections 7, 8 and 10-15 of the proposed Comprehensive Settlement Agreement, after consultation with Commission Water Division Staff and parties to the proceeding. The Tier 3 advice letters shall also provide specific detail to implement the provisions consistent with this decision. The Tier 3 advice letter shall be submitted no later than January 1, 2019.	CAW received approval for AL 1220-A in Res W-5211 on 12/27/2019.	D. 18-09-017
197	Ongoing	Ordering P. 26. Prior to submitting the Tier 2 advice letters to implement the tariffs in Appendix E of the Return Water Settlement, California-American Water Company shall meet with Commission Water Division Staff and parties to this proceeding to ensure that the tariffs and Tier 2 advice letters submitted consistent with the Return Water Settlement include conditions that limit liability to ratepayers, and clearly recognize that California-American Water Company bears the risk for non-compliance or increased return water deliveries consistent with this decision.	CAW will comply with this order as required once the construction of the plant is complete.	D. 18-09-017
198	Ongoing	Ordering P. 27. California-American Water Company shall record and track separately all collections and expenditures of the Construction Funding Charge in a memorandum account. If the Monterey Peninsula Water Supply Project does not go online or become used or useful to ratepayers the funds collected shall be returned to ratepayers.	CAW will comply with this order as required once the construction of the plant is complete.	D. 18-09-017
199	Completed	Ordering P. 28. California-American Water Company shall record and track all capital costs for the MPWSP in a memorandum account. All financing, expenditures, schedule, and progress with construction for the Monterey Peninsula Water Supply Project shall be included in Cal-Am's quarterly reports, along with any information that the Commission Water Division staff reasonably requires, and any other information reasonably necessary for a full and complete reporting to the Commission.	Reports published at https://www.watersupplyproject.org/update	D. 18-09-017
200	Completed	Ordering P. 29. California-American Water Company shall include in its quarterly reports the amounts collected and expended pursuant to the Construction Funding Charge, and all other expenditures for capital costs as of the date of the quarterly report, any other information that Commission Water Division staff reasonably requires, and any other further information reasonably necessary for a full and complete reporting to the Commission of construction costs for the Monterey Peninsula Water Supply Project and remaining Cal-Am Only Facilities.	Reports published at https://www.watersupplyproject.org/update	D. 18-09-017

Item	Status	Compliance Order	Comments	Decision/ Resolution
201	Ongoing	Ordering P. 30. California-American Water Company shall file a Tier 2 advice letter, after consulting with parties and Commission Water Division Staff, for the first year revenue requirement after the facility has been built and is online consistent with the ratemaking framework set forth in Sections 6, 7, 8, and 14 of the Comprehensive Settlement.	CAW will comply with this order as required once the construction of the plant is complete.	D. 18-09-017
202	Ongoing	Ordering P. 31. If the Monterey Peninsula Water Supply Project goes offline for any reason other than routine maintenance or operates below production capacity levels required to meet customer need for four weeks or more Cal-Am must promptly notify and meet with Commission Water Division staff to explain why the facility is offline or operating below capacity, as well as to assess the seriousness of the outage, whether the MPWSP will be offline for an extended period of time, and to what extent the MPWSP or a portion of its costs should be removed from rates.	Not applicable until commencement of desal plant operations	D. 18-09-017
203	Ongoing	Ordering P. 32. Within thirty days of the notification ordered in Ordering Paragraph 31, Cal-Am is to provide a report to Commission Water Division staff setting forth the information provided in the meeting with staff, documentation as to the status of the plant operations and timeline for bringing the plant back online. The report shall be provided to Water Division staff and Cal PA no later than the beginning of the fifth week of outage or subpar performance. The report is to also include the estimated amount that loss of operation is costing ratepayers and a mechanism to refund/credit ratepayers for such amount.	Not applicable until commencement of desal plant operations	D. 18-09-017
204	Ongoing	Order P. 33. If the Monterey Peninsula Water Supply Project (MPWSP) is offline, or the slant wells fail to produce at a level that is cost effective for ratepayers for two or more months, California-American Water Company (Cal-Am) shall notify and meet with Commission Water Division staff. The notification and meeting shall occur no later than the beginning of the ninth week of outage or subpar performance. Cal-Am shall provide a proposed process to have the plant back online with a timeline, or proposal to remove the MPWSP from ratebase and determine an appropriate mechanism to reimburse ratepayers for any recovery of costs for the time the MPWSP is not used and useful.	Not applicable until commencement of desal plant operations	D. 18-09-017
205	Ongoing	Ordering P. 34. California-American Water Company (Cal-Am) must make a showing that the expenditures at issue for the Monterey Peninsula Water Supply Project (MPWSP) are reasonable. Each reasonableness showing must include evidence that the MPWSP financing is the lowest cost and most beneficial for ratepayers; that construction is progressing in a timely manner within the cost caps authorized in this decision. Cal-Am will be required to demonstrate the reasonableness of such costs in the first General Rate Case after the MPWSP is operational.	CAW will comply with this order as required once the construction of the plant is complete.	D. 18-09-017
206	Ongoing	Ordering P. 38. The motion submitted for adoption of the Brine Discharge Settlement is hereby granted. California-American Water Company shall comply with each term and condition set forth in the Settlement Agreement set out at Appendix I to this decision.	CAW will comply with terms of return brine agreement, most of which is not applicable until desal plant is operational	D. 18-09-017
207	Ongoing	Ordering P. 39. The motion submitted for adoption of the Return Water Settlement Agreement is hereby granted. California-American Water Company shall comply with each term and condition set forth in the Settlement Agreement set out at Appendix H to this decision.	CAW will comply with terms of return brine agreement, most of which is not applicable until desal plant is operational	D. 18-09-017
208	Ongoing	Ordering P. 41. The framework set forth in the Comprehensive Settlement is adopted consistent with this decision, independent of the proposed settlement agreement, based on the testimony and briefing submitted into the record by the parties.	CAW is in compliance with the settlement agreement	D. 18-09-017

Item	Status	Compliance Order	Comments	Decision/ Resolution
209	Completed	H&SC Section 116277(a) requires that all community water systems (water utilities) test for lead in the potable water systems of schools served by the utility that were constructed before January 1, 2010. The requirements of Section 116277 do not apply to schools constructed or modernized after July 1, 2010. Also, Section 116277 does not apply to schools which have requested lead testing pursuant to the 2017 State Water Resources Control Board- Division of Drinking Water program. Lead tests should be completed on or before July 1, 2019. The utility is to report its findings to the school site within 10 business days after receiving lead testing results or 2 business days if the results exceeds 15 parts per billion, ppb. If the results exceed 15 ppb, the utility is also required to test for lead levels at a appoint where the utility distribution system connects to the school site to determine the lead levels in the utility distribution system supply the school site. Finally, each utility is to work cooperatively with the local educational agency to prepare a sampling plan for each school site. The utility may request assistance in developing the sampling plan from the State Water Resources Control Board - Division of Drinking Water or local health agency responsible for the utility's water quality regulation.	California American Water has either tested all schools it has identified in its service areas, or has sought an exemption from DDW because the school meets one or more criteria for an exemption (e.g., the school conducted its own testing, or isn't served by California American Water). With the exception of the pending exemption requests, all drinking water systems currently owned and operated by California American Water have been tested in accordance with Section 116277, and all data has been processed as required. 5/20/21: A review of records confirmed that all outstanding exemptions have been received.	AB 746, Health & Safety Co
210	Ongoing	Ordering P. 15. California-American Water Company shall separately identify billing adjustments in workpapers for all Water Revenue Adjustment Mechanism and Modified Cost Balancing Account filings.	Cal Am has complied with this order in subsequent WRAM/MCBA filings coming after D.18-12-021. CAW filed the 2018 WRAM in September 2019 based on the delayed GRC decision. CAW filed the 2019 WRAM in March 2020 and the 2020 WRAM in March 2021. CAW intends to file the 2021 WRAM in June 2022.	D. 18-12-021
211	Ongoing	Ordering P. 17. An upper non-revenue water (NRW) threshold of 7.0% and lower NRW threshold of 5.0% of total adopted production levels are adopted for California-American Water Company's Monterey District. California-American Water Company shall accrue penalties pursuant to its NRW Reward/Penalty Mechanism for NRW levels that exceed the upper threshold and earn rewards for NRW levels that are below the lower threshold. California-American Company shall neither accrue a penalty nor earn a reward in its Monterey District for NRW levels between 5.0% and 7.0%, inclusive.	The new rules were included in the Accounting Memo and have been implemented by Accounting starting retroactively to 1/1/18.	D. 18-12-021
212	Ongoing	Ordering P. 19. By June 30, 2019, California American Water Company (Cal-Am) shall file a Tier 3 advice letter to refund the 2018 Excess Protected Accumulated Deferred Income Tax (ADIT), which should have been recorded in the Tax Memorandum Account, to ratepayers as a bill credit, based on the size of the customer's meter. Cal-Am shall file Tier 3 advice letter by June 30, 2020 and a Tier 3 advice letter by June 30, 2021 to refund the 2019 Excess Protected ADIT and the 2020 Excess Protected ADIT to ratepayers as a bill credit, based on the size of the customer's meter. Each refund shall be amortized evenly over a period of one year. Each advice letter shall include any necessary revenue requirement adjustments to rate base caused by the return of the ADIT balances. In each advice letter, Cal-Am shall provide calculations and supporting documentations that demonstrate (1) an estimation of the Excess Protected ADIT for each year, (2) how the Excess Protected ADIT balances were calculated for each year, and (3) the normalization method used. Cal-Am is not required to refund the Excess Protected ADIT balances faster or sooner than allowed pursuant to the normalization rules of the Internal Revenue Service.	Cal Am filed AL 1247 on June 30, 2019, AL 1300 on June 30, 2020, and AL 1340 on June 30, 2021. The final 2020 refund will be completed by November 2022.	D. 18-12-021
213	Completed	Ordering P. 20. By June 30, 2019, California American Water Company (Cal-Am) shall file a Tier 2 advice letter with Water Division to refund the \$7.1 million of Excess Unprotected Accumulated Deferred Income Tax as a bill credit, based on the size of the customer's meter. Cal-Am shall amortize the refund equally over the 24-month period from 2019 to 2020.	Cal Am filed AL 1246 on June 30, 2019. The refund has been distributed and this item is complete.	D. 18-12-021
214	Completed	Ordering P. 21. California-American Water Company is directed to report in its next General Rate Case whether it completed the following tank improvement projects in its Monterey District: Lower Pasadera Tank, Upper Pasadera Tank #1, Upper Pasadera Tank #2, Huckleberry Tank #2, Boots Tank, Forest Lake Tank #1, and High Meadows Tank #1.	Provided in 2019 GRC filing	D. 18-12-021
215	Completed	Ordering P. 22. In its next General Rate Case, California-American Water Company shall provide information regarding historic expenditures for its deferred tank improvement expenses.	Provided historic tank maintenance in 2019 GRC filing	D. 18-12-021
216	Ongoing	Ordering P. 27. California-American Water Company shall file a Tier 1 advice letter with Water Division to notify the Commission that it will begin recording costs into the Emergency Rationing Costs Memorandum Account. California-American Water Company shall file the advice letter within 30 days of the time when the Company begins to record costs related to the event.	Cal Am will comply with this order when this type of event occurs.	D. 18-12-021

Item	Status	Compliance Order	Comments	Decision/ Resolution
217	Ongoing	Ordering P. 28. California-American Water Company (Cal-Am) shall file a Tier 1 advice letter with Water Division to notify the Commission within 30 days of the time when Cal-Am begins to record costs in the Water Contamination Litigation Expense Memorandum Account. In the advice letter, Cal-Am shall also specify the water litigation case for which the costs are recorded.	Cal Am will comply with this order when this type of event occurs.	D. 18-12-021
218	Ongoing	Ordering P. 29. California-American Water Company shall file a Tier 1 advice letter with Water Division to notify the Commission of a water-rationing event within 30 days of the time when the Company begins to record costs related to the event in its Emergency Rationing Costs Memorandum Account.	Cal Am will comply with this order when this type of event occurs.	D. 18-12-021
219	Ongoing	Ordering P. 32. California-American Water Company's request that it be authorized to collect franchise fees paid to various municipalities through a separate surcharge for all of its districts, including any and all newly acquired systems in the future, is granted.	Cal Am filed AL 1230-B on May 8, 2019 in compliance with this order. Franchise fees were broken out for all districts when new rates began appearing on bills in mid-2019. Upon rate consolidation of newly acquired systems, CAW breaks out franchise fees on customer bills where franchise agreements are in place.	D. 18-12-021
220	Completed	Ordering P. 34. California-American Water Company's (Cal-Am's) request for authorization to establish a pilot program that allows it to waive individual transaction fees charges to customers who pay their bills with credit cards is granted. Cal-Am is authorized to open a memorandum account to track the fees that have been waived as well as the cost savings that result with the use of a credit card compared to the costs associated with bank fees and lock box fees. Cal-Am shall operate and report on this pilot program in accordance with the requirements set forth in Assembly Bill 1180 (Stats. 2016, Ch. 254).	Cal Am filed AL 1241 on April 25, 2019 in compliance with this order. CAW filed a report on the credit card program in November 2020.	D. 18-12-021
221	Completed	Ordering P. 35. California-American Water Company (Cal-Am) shall report on the results of its new credit card pilot program in its next General Rate Case and include the assessments required pursuant to Public Utilities Code Section 915(a). Cal-Am shall also submit an updated report on the pilot program to the Commission's Water Division no later than March 31, 2020, which addresses the assessments required pursuant to Public Utilities Code Section 915(a).	CAW reported on the credit card pilot program in A.19-07-004. The report on the pilot program was submitted in October 2020.	D. 18-12-021
222	Ongoing	Ordering P. 38. California American Water Company (Cal-Am)'s request for authorization for Cal-Am to have a third-party test a customer's backflow prevention device on the customer's behalf and pass the costs of that test on to the customer if the customer does not timely test and report those results to Cal-Am is granted. The third-party services related to the "test and charge" system shall be competitively procured. Cal-Am shall record the processing fees and any customer reimbursement of costs associated with the third-party services as miscellaneous revenue for review in its next General Rate Case.	With authorization in the 2018 rate case, California American Water will continue to explore this "test and charge" program.	D. 18-12-021
223	Completed	Ordering P. 41. California-American Water Company (Cal-Am) is authorized to shift authorized conservation budget amounts between best management practice rate categories within a service area. Cal-Am shall continue to track conservation expenses in the one-way California American Water Conservation Surcharge Balancing Accounts with any unspent funds refunded to ratepayers on an annual basis after the end of each year of the General Rate Case cycle. Cal-Am shall file a Tier 2 advice letter no later than 45 days after the end of each year providing an accounting of conservation funds spent with supporting documentation, as well as a proposal to refund to customers any unspent budgeted funds.	Tier 2 Advice letter has been filed timely within 45 days of YE2018. No refund to customer required.	D. 18-12-021
224	Completed	Order P. 2. California American Water shall refund the difference between the 1 inch and ¾ inch Pre-2015 Water Rate Adjustment Mechanism (WRAM) surcharge rate for the period August 2017 through the most recent billing statement paid in full. The monthly difference totals \$10.07. See calculation below: (1 inch WRAM) – (¾ inch WRAM) =\$30.23-20.16 =\$10.07	Customer was provided with refund in March 5th bill - Item completed	D. 19-01-009

Item	Status	Compliance Order	Comments	Decision/ Resolution
225	Completed	Order P. 3. California American Water shall refund the difference between the 1 inch and ¾ inch Seaside Basin BA surcharge rate for the period August 2017 through the most recent billing statement paid in full. The monthly difference totals \$10.07. See calculation below: (1 inch Seaside Basin) – (¾ inch Seaside Basin) =\$0.91-\$0.55 =\$0.36	Customer was provided with refund in March 5th bill - Item completed	D. 19-01-009
226	Completed	Order P. 4. California American Water shall adjust the monthly service charges, including the Pre-2015 Water Rate Adjustment Mechanism surcharge, and the Seaside Basin BA surcharge, going forward to reflect the rate for the ¾ inch meter.	Customer was provided with refund in March 5th bill - Item completed	D. 19-01-009
227	Completed	4.4 Process...The Parties agree that the ACP/CAM would adjust rates on a prospective basis through the following proposed process 4.4.1 Cal-Am would be required to file an annual Tier 2 advice letter on or before November 15. The advice letter would provide the actual recorded consumption and legal and court ordered production limitations for the Monterey Main system customer classes that are covered by the process defined and detailed in this settlement. Further, the information provided will be monthly data by affected classification and by tier from October 1 of the prior year through September 30 of the current year. This data will be exactly the same data as will be presented in the annual required WRAM/MCBA report that is required to be filed on an annual basis.	CAW made its first ACAM filing in 2019. It subsequently made filings for 2020 and 2021 in compliance with this order. CAW's most recent GRC decision, D.21-11-018 made the ACAM program permanent in Monterey and CAW filed its 2022 ACAM in January 2022 in compliance with the decision.	D. 18-05-027
228	Completed	4.4.2 With approval of the Tier 2 advice letter by the Commission's Water Division, a Tier 1 advice letter would be filed to implement new rates on January 1 of the subsequent year.	CAW made its first ACAM filing in 2019. It subsequently made filings for 2020 and 2021 in compliance with this order including the tier 1 filings to implement rates. CAW's most recent GRC decision, D.21-11-018 made the ACAM program permanent in Monterey and CAW filed its 2022 ACAM in January 2022 in compliance with the decision.	D. 18-05-027
229	Completed	4.4.3 This consumption and production data would then replace the adopted quantities beginning January 1 of the subsequent year and would be used for future rate adjustments, including all annual step and offset filings, in that calendar year until the adopted quantities are updated the following year.	California American Water complies with this requirement through its Escalation and ACAM filings. The Escalation and ACAM filings are made in conjunction and incorporate actual consumption and production data.	D. 18-05-027
230	Completed	4.5.1 Current rates are based on the adopted average annual consumption, as determined in D.15-04-007. These current rates are to be modified by the use of actual 2015 consumption data by rate class and by tier as ordered in D.16-12-003. 4.5.2 Proposed rates in the escalation and attrition year (e.g., 2019 and 2020 of the current general rate case (A.16-07-002)) would be based on the actual recorded consumption and consumption by tier for residential and by division for non-residential customers for the 12-month period ended September 30, unless such recorded consumption is greater than the court ordered or legally restricted limits to be in place during the projected period, in which case the production limit will be set at the maximum limitations of the court order and legal restrictions.	CAW complied with this requirement in its ACAM filings, AL 1237 (2018), AL 1274 (2019), AL 1315 (2020). D.21-11-018 made the pilot ACAM permanent. CAW filed AL 1360 (2021) under the new regulations.	D. 18-05-027
231	Completed	4.7.1 Parties agree that Cal-Am will track the incremental difference between the revenue that should be collected in a given year under the ACP/CAM and the incremental actual revenues collected.	CAW complied with this requirement in its ACAM filings, AL 1237 (2018), AL 1274 (2019), AL 1315 (2020). D.21-11-018 made the pilot ACAM permanent. CAW filed AL 1360 (2021) under the new regulations.	D. 18-05-027
232	Completed	4.7.2 Parties agree that Cal-Am will track the incremental difference between the production costs that were authorized in a given year under the ACP/CAM and the actual production costs that were incurred in that year.	CAW complied with this requirement in its ACAM filings, AL 1237 (2018), AL 1274 (2019), AL 1315 (2020). D.21-11-018 made the pilot ACAM permanent. CAW filed AL 1360 (2021) under the new regulations.	D. 18-05-027
233	Completed	4.7.3 The Parties agree that any consumption based surcharges that are in place in the Monterey Main system, as defined above, will be recalculated to take into account the new annual consumption forecast resulting through the ACP/CAM.	CAW complied with this requirement in its ACAM filings, AL 1237 (2018), AL 1274 (2019), AL 1315 (2020). D.21-11-018 made the pilot ACAM permanent. CAW filed AL 1360 (2021) under the new regulations.	D. 18-05-027
234	Completed	4.8.1 The Parties agree that Cal-Am will provide notifications to all affected customers in the Monterey County District, including a description of the ACP/CAM and will conduct community outreach to explain how the ACP/CAM changes affect customers. Cal-Am agrees that it will notify ORA and MPWMD of its efforts to notify its customers.	CAW complied with this requirement in its ACAM filings, AL 1237 (2018), AL 1274 (2019), AL 1315 (2020). D.21-11-018 made the pilot ACAM permanent. CAW filed AL 1360 (2021) under the new regulations.	D. 18-05-027
235	Completed	4.8.2 The Parties agree that the Company will provide an annual notice to customers of the effect on rates of any changes that occur as a result of the annual consumption adjustment made effective due to the ACP/CAM.	CAW complied with this requirement in its ACAM filings, AL 1237 (2018), AL 1274 (2019), AL 1315 (2020). D.21-11-018 made the pilot ACAM permanent. CAW filed AL 1360 (2021) under the new regulations.	D. 18-05-027

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236	Completed	4.3.4 Cal-Am will work with MPWMD to review its shared conservation- and rationing-oriented responsibilities to ensure that any overlapping compliance and/or enforcement obligations are clearly delineated. To the extent necessary, Cal-Am will include any changes to its tariffs either in its 2019 general rate case or through a Tier 2 advice letter.	California American Water has been closely working with MPWMD on shared conservation and rationing oriented responsibilities such as water waste violation enforcement, BMP compliance and others. This item is closed following D.21-11-018.	D. 18-07-014
237	Completed	4.3.5 Cal-Am agrees to work in coordination with MPWMD to audit its Monterey District non-residential customers' compliance with the rate best management practices (BMP) compliant standards during the 2019 (filing period) general rate case (2021 test year) and will consider then current MPWMD water efficiency standards.	Audits continue to be performed. Outdoor audits have been continually performed during 2021.	D. 18-07-015
238	Completed	Ordering P. 1. California-American Water Company is authorized to transfer the balances of the Conservation/Rationing Memorandum Account for each of its six districts to the Consolidated Expense Balancing Account for each district and to amortize the transferred balances through the following surcharges and surcredits: (see table in resolution)	Advice Letters 1200A - 1205B included a request to close and remove the Conservation Rationing Memorandum Account. Advice Letter 1200A was filed on 2/26/19 and was approved 5/20/19. Advice Letter 1201A was filed on 2/26/19 and was approved 5/20/19. Advice Letter 1202B was filed on 4/11/19 and was approved 5/20/19. Advice Letter 1203A was filed on 2/26/19 and was approved 5/20/19. Advice Letter 1204A was filed on 2/26/19 and was approved 5/20/19. Advice Letter 1205B was filed on 4/17/19 and was approved 5/18/19.	R. W-5186
239	Completed	Ordering P. 3. Cal-Am in its next General Rate Case filing shall request to consolidate for ratemaking purposes Rio Plaza Water Company, Inc. with its Los Angeles District consistent with this Decision.	Consolidation of the Rio Plaza service area was included in the 2019 GRC and approved in D.21-11-018	D. 19-04-015
240	Completed	Ordering P. 7. In accordance with this Decision, Cal-Am shall request to consolidate the Rio Plaza Water Company, Inc. service area into its Los Angeles County District in its next General Rate Case filing.	Consolidation of the Rio Plaza service area was included in the 2019 GRC and approved in D.21-11-018	D. 19-04-015
241	Completed	Ordering P. 8. Any future General Rate Case filed by Cal-Am is to be consistent with this Decision.	The 2019 GRC, and D.21-11-018 adopted in that proceeding, was consistent with this Decision.	D. 19-04-015
242	Completed	Ordering P. 9. Until Cal-Am files its next General Rate Case, the rates in the Rio Plaza Water Company, Inc. service area are to remain the same, with the addition of an increase to account for the consumer Price Index for All Urban Consumers for the years 2019 and 2020 consistent with this Decision.	CAW maintained previously approved rates for Rio Plaza for 2019 and 2020. Rio Plaza was consolidated for ratemaking purposes in TY 2021 as authorized in D.21-11-018	D. 19-04-015
243	Completed	Ordering P. 10. Cal-Am is entitled to recover the Rio Plaza Trust Ownership Accumulated Deferred Income Tax consistent with this Decision. Recovery shall begin in the first test year for the next Cal-Am General Rate Case application filing.	Ratemaking treatment of the Accumulated Deferred Income Tax adjustment is addressed in D.21-11-018.	D. 19-04-015
244	Completed	Ordering P. 11. Cal-Am is authorized to file a Tier 2 Advice Letter to establish a Transaction Memorandum Account consistent with this Decision.	Cal-Am filed Advice Letter 1245, seeking approval of a Rio Plaza Transaction Memorandum Account, on June 12, 2019	D. 19-04-015
245	Completed	Ordering P. 12. Within 10 days of the completion of the sale by the John Chris Nickel, Sr., Trustee for the John C. Nickel Trust (Trust) to Cal-Am of all the Trust's shares in Rio Plaza Water Company, Inc. (Rio Plaza), Cal-Am and Rio Plaza are to jointly notify the Commission's Director of the Water Division in writing that the sale has been completed.	Cal-Am provided notification to the Commission's Director of the Water Division on June 7, 2019	D. 19-04-015
246	Completed	Ordering P. 13. Cal-Am is authorized to file a Tier 1 Advice Letter to add Rio Plaza Water Company, Inc. to its existing Memorandum Account for Environmental Improvement and Compliance Issues for Acquisitions.	Advice Letter 1244 was filed on June 4, 2019. In this filing California American Water sought Commission authorization to add Rio Plaza Water Company to its existing Memorandum Account for Environmental Improvements and Compliance Issues for Acquisitions.	D. 19-04-015
247	Completed	Ordering P. 1. Cal-Am's Advice Letter 1226 requesting Commission authorization to transfer an \$878,665 overcollection in the Seaside Groundwater Basin Balancing Account to the Consolidated Expense Balancing Account (CEBA) and recover in rates the CEBA balance of \$4,162,023 by adding surcharges is approved as set forth in this Resolution. The following CEBA surcharges are approved (see chart in Resolution).	CEBA surcharges from resolution were implemented as described in decision.	R. W-5197

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248	Completed	Ordering P. 2. Authority is granted under Public Utilities Code Section 454 to California-American Water Company to file supplements to Advice Letter No. 1226 incorporating the surcharges authorized in Ordering Paragraph No. 1 and to concurrently cancel its presently effective Rate Schedules within five days of the effective date of this Resolution. The effective date of the Rate Schedules shall be five days after the effective date of this Resolution.	CEBA surcharges from resolution were implemented as described in decision.	R. W-5197
249	Completed	Ordering P. 1. The Commission's adopted emergency disaster customer relief protections shall apply to all electric, gas, water, and serve utility customers in affected areas in a state of emergency declared by the California Governor's Office or the President of the United States and shall remain in effect pursuant to the timelines established in this Decision. Nothing in this Decision bars or otherwise prohibits utilities from implementing their own disaster assistance programs to supplement these adopted emergency customer protections.	California American Water adopt the Commission's emergency disaster relief protections in affected areas where a state of emergency was declared. During recent wildfires in our Northern Division, CAW provided bill assistance and payment relief.	D. 19-07-015
250	Completed	Ordering P. 9. In the event the Governor of California or the President of the United States declares a state of emergency because a disaster has either resulted in the loss or disruption of the delivery or receipt of utility service and/or resulted in the degradation of the quality of utility service, all Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall file a Tier 1 Advice Letter within 15 days of the Governor's or the President of the United States state of emergency proclamation reporting compliance with implementing this Decision's mandated emergency customer protections and outreach activities.	CAW complied with this order with AL 1267 regarding the Kincade Fire in Sonoma County in late 2019 and AL 1284 and AL 1294 regarding the COVID-19 pandemic in March of 2020, and AL 1308 in Sept of 2020 related to the CA wildfires.	D. 19-07-015
251	Ongoing	Ordering P. 10. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall track the associated costs with the emergency customer protections in the respective Catastrophic Event Memorandum Accounts and extend their applicability of those memorandum accounts to costs for implementing customer protections for all disasters in which the Governor of California or the President of the United States has declared a state of emergency. Catastrophic Event Memorandum Accounts or Emergency Customer Protections Memorandum Account tariff language must specify that entries in the account will be segregated by qualifying event. Costs for emergency customer protection activities should be recovered across each utility's entire customer base and the water and sewer utilities stated above, shall make any necessary tariff changes in accordance with the advice letter procedures prescribed by General Order 96-B.	Being done for fires and Covid.	D. 19-07-015
252	Completed	Ordering P. 11. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).), shall file a Tier 1 Advice Letter at the default, 12-month conclusion of customer protection period (running from the date that customer protections related to the specific disaster became effective), or as reasonably determined by the Governor's Office of Emergency Services, detailing the mandated protections offered to the customer affected by the disaster, the start and end periods customers received the emergency customer protections, the outreach efforts conducted, the customer impacts, and the associated cost.	CAW complied with this order by filing AL 1317 with an update on the customer protections described in AL 1267. For the Covid pandemic, CAW filed AL 1325 and for the 2020 wildfires, CAW filed AL 1345.	D. 19-07-015

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253	Completed	Ordering P. 12. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall file a Tier 1 Advice Letter twelve months from a qualifying event, documenting the collaborative engagement they had with the Governor's Office of Emergency Services and the California Department of Forestry and Fire Protection demonstrating information sharing that aided these entities in carrying out their mission.	CAW complied with this order by filing AL 1317 with an update on the customer protections described in AL 1267. For the Covid pandemic, CAW filed AL 1325 and for the 2020 wildfires, CAW filed AL 1345.	D. 19-07-015
254	Completed	Ordering P. 13. All Class-A Water utilities (California Water Service Company, California American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos Water, and Park Water), San Jose Water Company, San Gabriel Valley Water Company, and Suburban Water Systems as well as all Class-B Water utilities (Fruitridge Vista Water Company, Bakman Water Company, Del Oro Water Company, East Pasadena Water Company, Santa Catalina Island Water (a division of Southern California Edison Company), and Alco Water Service).) shall file a Tier 1 Advice Letter 60 days from the effective date of this decision, setting forth the plan for customer outreach of these protections in English, Spanish, Chinese (including Cantonese, Mandarin, and other Chinese languages), Tagalog, and Vietnamese as well as Korean and Russian where those languages are prevalent within the utilities' service territories.	CAW complied with this order in AL 1258-A.	D. 19-07-015
255	Completed	Ordering P. 2. Upon closing of the purchase, California-American Water company shall (a) increase its rate base by \$6,500,000; (b) amortize \$970,459 of the total purchase price over a period of 40 years; (c) create an Account for Deferred Income Taxes in the amount of \$2,014,575; and (d) amortize the Account for Deferred Income Taxes over a period of 40 years.	Increase to rate base and amortization was addressed in the 2019 GRC application. Hillview memorandum account for deferred income taxes was established with AL 1299-A. Amortization of deferred income taxes was incorporate in the 2019 GRC application.	D. 19-11-003
256	Completed	Ordering P. 4. The contract between California-American Water Company (Cal-Am) and Roger Forrester is approved subject to the conditions that any costs beyond the basic fee of \$250,000 and the costs of any extension of the agreement will be borne by Cal-Am shareholders.	We have terminated all agreements with Roger Forrester. There will be no costs of any extension of the agreement.	D. 19-11-003
257	Completed	Ordering P. 5. The "Memorandum Account for Environmental Improvements and Compliance Issues for Acquisitions" is expanded to allow the same costs as may be required in the Hillview Water Company, Inc. acquisition as were allowed in the already approved account as related to the acquisitions of service areas in Dunnigan, Geyserville, Meadowbrook, and Rio Plaza is approved, subject to the proviso that the account exclude funds authorized in Advice Letter 113.	CAW filed AL 1299 on 6/24/2020 in compliance with this order.	D. 19-11-003
258	Completed	Ordering P. 6. All dollar amounts set forth herein shall be adjusted as of the date of closing of the purchase of Hillview Water Company, Inc.	Adjustment of dollars shown in the Decision will be addressed with the 2022 GRC Application as addressed in the testimony of Stephen Wesley Owens.	D. 19-11-003
259	Completed	Ordering P. 2. The authority for Cook Endeavors d/b/a Fruitridge Vista Water Company to sell and transfer to California American Water Company (Cal-Am) all of its utility assets is granted, conditioned on Cal-Am's receipt of a temporary or final operating permit from the State Water Resources Control Board, Division of Drinking Water to operate the Fruitridge Vista Water Company.	Completed	D. 19-12-038
260	Completed	Ordering P. 4. California-American Water Company (Cal-Am) is authorized to assume all public utility responsibilities for the ownership and operation of the water utility operations of the Fruitridge system (subject to obtaining an operating permit as described in Ordering Paragraph 2 above). Cal-Am is authorized to operate the Fruitridge system under Fruitridge's current rates.	CAW closed on the Fruitridge Vista acquisition in February of 2020 and assumed all public utility responsibilities for the ownership and operation of the system at that time.	D. 19-12-038
261	Completed	Ordering P. 5. California-American Water Company may track costs incurred in connection with the transaction and environmental costs associated with the acquisition in memorandum accounts.	Existing memorandum account was modified to include Fruitridge with AL 1279.	D. 19-12-038

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262	Completed	Ordering P. 6. California-American Water Company's (Cal-Am) certificate of public convenience and necessity is amended so that Cal-Am may provide public utility water service to the current and future customers in Cook Endeavors d/b/a Fruitridge Vista Water Company's service territory.	Completed	D. 19-12-038
263	Completed	Ordering P. 7. California-American Water Company may file Tier 1 Advice Letters to establish environmental/compliance and transaction costs memorandum accounts to track costs associated with the acquisition.	California American Water filed AL 1279 on 2/4/2020 in compliance with this order. AL 1279 was approved on 7/28/2020.	D. 19-12-038
264	Completed	Ordering P. 8. California-American Water Company may file a Tier 1 Advice Letter to establish a Meter Installation Memorandum Account.	California American Water filed AL 1279 on 2/4/2020 in compliance with this order. AL 1279 was approved on 7/28/2020.	D. 19-12-038
265	Completed	Ordering P. 9. California-American Water Company may file a Tier 3 Advice Letter to seek recovery of the transaction costs associated with the acquisition or seek recovery in the next general rate case proceeding.	CAW is seeking recovery with the 2022 GRC.	D. 19-12-038
266	Ongoing	Ordering P. 12 Confidential versions of documents are granted confidential treatment for a period of three years from the date of this order. During this three-year period, this information may be viewed by Commission staff, the assigned Commissioner and staff, the assigned Administrative Law Judge (ALJ), the Assistant Chief ALJ, and the Chief ALJ, or any others which parties have agreed to in writing or as ordered by a court of competent jurisdiction. If the parties believe that it is necessary for this information to remain under seal for longer than three years, either of the parties may file a motion providing a justification for a further extension at least 30 days before the expiration of the three-year period granted by this order.	CAW is complying with this order	D. 19-12-038
267	Completed	Ordering Paragraphs 1 and 2 - 1. Salinas Valley Water Coalition shall be awarded \$491,077.26. 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay Salinas Valley Water Coalition the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 18, 2019, the 75th day after the filing of Salinas Valley Water Coalition's request, and continuing until full payment is made.	On January 31, 2020, California American Water issued a payment to Salinas Valley Water Coalition. On 1/7/2020 California American Water filed AL 1302 for recovery. AL 1302 was approved by CPUC on 10/26/2020.	D. 19-12-049
268	Completed	Ordering Paragraphs 1 and 2 - 1. Surfrider Foundation is awarded \$432,423.17. 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay Surfrider Foundation the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month nonfinancial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 3, 2019, the 75th day after the filing of Surfrider Foundation's request, and continuing until full payment is made.	On January 31, 2020, California American Water issued a payment to Surfrider Foundation. On 5/15/2020 California American Water filed AL 1295 for recovery. AL 1295 was approved by CPUC on 9/22/2020.	D. 19-12-048
269	Completed	Ordering Paragraphs 1 and 2 - 1. Water Plus shall be awarded \$25,460.00. 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay Water Plus the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning, March 07, 2016 the 75th day after the filing of Water Plus' request, and continuing until full payment is made.	California American Water issued payment on 12/27/2019 and 2/19/2020 to Water Plus.	D. 17-12-020
270	Completed	Ordering Paragraphs 1 and 2 - 1. Public Water Now shall be awarded \$16,617.51. 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay Public Water Now the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning March 5, 2016, the 75th day after the filing of Public Water Now's request, and continuing until full payment is made.	On 6/19/2017, California American Water issued a payment to Public Water Now. On 11/7/2017 California American Water filed AL 1180 for recovery. AL 1180 was approved on 1/9/2018.	D. 17-05-030
271	Completed	Ordering P. 2 - California-American Water Company's Advice Letter 1220, as supplemented, requesting Commission authorization to establish the MPWSP Phase 1 Project Cost Memorandum Account, and the MPWSP Operations and Maintenance Memorandum Account is approved as set forth in this Resolution. The Preliminary Statements for the new memorandum accounts are attached to this Resolution as Attachment B. The effective date of the Memorandum Accounts is December 31, 2018.	Effective dates outlined in the resolution for memorandum accounts reflected in California American Water's preliminary statements.	R. W-5211
272	Ongoing	Ordering P. 3 - California-American Water Company's request to file a Tier 2 advice letter upon receipt of a \$10 million grant from the Department of Water Resources to establish a revenue requirement for associated income taxes is denied. The ratemaking treatment will be considered in Application 19-07-004. California-American Water Company may file a Tier 2 advice letter, upon receipt of the grant proceeds, to request the establishment of a memorandum account to track the income tax expense associated with the grant proceeds.	CAW has not received the \$10 M grant from DWR. Upon receipt, this will be enacted.	R. W-5211

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273	Completed	Ordering P. 2. California-American Water Company's request in Advice Letter 1214 as supplemented to amortize the Chromium 6 Memorandum Account to recover its past capital and operating expenses in the amount \$858,329 through a temporary surcharge in Northern Division tariffs (including the customers in the Meadowbrook, Dunnigan and Geyserville) for a period of 12 months is approved. The temporary surcharge of \$0.0729 per hundred gallons is authorized to be added under a special condition in California American Water Company's tariff schedule in the Northern Division for the period January 1, 2020 through December 31, 2020. At the end of the amortization period any remaining balance shall be transferred to the Consolidated Expense Balancing Account and the Chromium 6 Balancing Account closed and removed from the Preliminary Statements in the tariff.	California American Water filed AL 1277 and 1324 in compliance with these orders. AL 1324 ended the surcharge and closed the balancing account.	R. W-5212
274	Completed	Ordering P. 3. Within five days of the effective date of this Resolution, California-American Water Company shall submit a Tier 1 advice letter to implement the tariff schedules attached as Appendix B to this Resolution. The Tier 1 advice letter shall also establish a Chromium 6 Balancing Account in the Preliminary Statements of its tariff, transfer the balance authorized for amortization from the Chromium 6 Memorandum Account to the Chromium 6 Balancing Account. California-American Water Company's Chromium 6 Memorandum Account shall remain open.	California American Water filed AL 1277 on 12/23/2019 in compliance with this order. AL 1277 was approved by the CPUC on 1/24/2020. D.21-11-018 authorized keeping this account open.	R. W-5212
275	Completed	Ordering P. 4. At the end of the 12-month amortization period, California-American Water Company shall submit a Tier 1 advice letter closing the Chromium 6 Balancing Account with any remaining balance, plus or minus, transferred to California-American Water Company's Consolidated Expense Balancing Account for its Northern Division.	California American Water filed AL 1277 and 1324 in compliance with these orders. AL 1324 ended the surcharge and closed the balancing account.	R. W-5212
276	Completed	Ordering P. 1. LandWatch Monterey County shall be awarded \$104,796.50; Ordering P. 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay LandWatch Monterey County the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 31, 2019, the 75th day after the filing of LandWatch Monterey County's request, and continuing until full payment is made.	On March 30, 2020, California American Water issued a payment to LandWatch. On October 23, 2020, California American Water filed AL 1313 for recovery. AL 1313 was approved by the CPUC on Dec 22, 2020.	D. 20-02-060
277	Completed	Ordering P. 1. Planning and Conservation League Foundation shall be awarded \$210,136.88; 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay Planning and Conservation League Foundation the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 3, 2019, the 75th day after the filing of Planning and Conservation League Foundation's request, and continuing until full payment is made.	On February 27, 2020, California American Water issued a payment to Planning and Conservation League Foundation. On October 23, 2020 California American Water filed AL 1314 for recovery. AL 1314 was approved by the CPUC on Dec 22, 2020.	D. 20-02-058
278	Completed	CA Health & Safety Code sec 116906. (a) An urban and community water system shall have a written policy on discontinuation of residential service for nonpayment available in English, the languages listed in Section 1632 of the Civil Code, and any other language spoken by at least 10 percent of the people residing in its service area. The policy shall include all of the following (1) A plan for deferred or reduced payments. (2) Alternative payment schedules. (3) A formal mechanism for a customer to contest or appeal a bill. (4) A telephone number for a customer to contact to discuss options for averting discontinuation of residential service for nonpayment. (b) The policy shall be available on the urban and community water system's Internet Web site, if an Internet Web site exists. If an Internet Web site does not exist, the urban and community water system shall provide the policy to customers in writing, upon request. (c) (1) The board may enforce the requirements of this section pursuant to Sections 116577, 116650, and 116655. The provisions of Section 116585 and Article 10 (commencing with Section 116700) of Chapter 4 apply to enforcement undertaken for a violation of this section. (2) All moneys collected pursuant to this subdivision shall be deposited in the Safe Drinking Water Account established pursuant to Section 116590.	CAW adjusted its collection timeline and implemented a nonpay shutoff moratorium and stopped assessing late payment fees to customers effective March 2020 through September 2021. CAW also updated Rule 11 to reflect these compliance orders.	SB 998, Health & Safety Cod

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279	Completed	<p>CA Health & Safety Code Sec 116906. (a) (1) (A) An urban and community water system shall not discontinue residential service for nonpayment until a payment by a customer has been delinquent for at least 60 days. No less than seven business days before discontinuation of residential service for nonpayment, an urban and community water system shall contact the customer named on the account by telephone or written notice. (B) When the urban and community water system contacts the customer named on the account by telephone pursuant to subparagraph (A), it shall offer to provide in writing to the customer the urban and community water system's policy on discontinuation of residential service for nonpayment. An urban and community water system shall offer to discuss options to avert discontinuation of residential service for nonpayment, including, but not limited to, alternative payment schedules, deferred payments, minimum payments, procedures for requesting amortization of the unpaid balance, and petition for bill review and appeal. (C) When the urban and community water system contacts the customer named on the account by written notice pursuant to subparagraph (A), the written notice of payment delinquency and impending discontinuation shall be mailed to the customer of the residence to which the residential service is provided. If the customer's address is not the address of the property to which residential service is provided, the notice also shall be sent to the address of the property to which residential service is provided, addressed to "Occupant." The notice shall include, but is not limited to, all of the following information in a clear and legible format: (i) The customer's name and address. (ii) The amount of the delinquency. (iii) The date by which payment or arrangement for payment is required in order to avoid discontinuation of residential service. (iv) A description of the process to apply for an extension of time to pay the delinquent charges. (v) A description of the procedure to petition for bill review and appeal. (vi) A description of the procedure by which the customer may request a deferred, reduced, or alternative payment schedule, including an amortization of the delinquent residential service charges, consistent with the written policies provided pursuant to subdivision (a) of Section 116906. (2) If the urban and community water system is unable to make contact with the customer or an adult occupying the residence by telephone, and written notice is returned through the mail as undeliverable, the urban and community water system shall make a good faith effort to visit the residence and leave, or make other arrangements for placement in a conspicuous place of, a notice of imminent</p>	CAW has implemented these compliance orders.	SB 998, Health & Safety Cod
280	Completed	<p>CA Health & Safety Code Sec 116906. (a) An urban and community water system shall not discontinue residential service for nonpayment if all of the following conditions are met: (1) The customer, or a tenant of the customer, submits to the urban and community water system the certification of a primary care provider, as that term is defined in subparagraph (A) of paragraph (1) of subdivision (b) of Section 14088 of the Welfare and Institutions Code, that discontinuation of residential service will be life threatening to, or pose a serious threat to the health and safety of, a resident of the premises where residential service is provided. (2) The customer demonstrates that he or she is financially unable to pay for residential service within the urban and community water system's normal billing cycle. The customer shall be deemed financially unable to pay for residential service within the urban and community water system's normal billing cycle if any member of the customer's household is a current recipient of CalWORKs, CalFresh, general assistance, Medi-Cal, Supplemental Security Income/State Supplementary Payment Program, or California Special Supplemental Nutrition Program for Women, Infants, and Children, or the customer declares that the household's annual income is less than 200 percent of the federal poverty level. (3) The customer is willing to enter into an amortization agreement, alternative payment schedule, or a plan for deferred or reduced payment, consistent with the written policies provided pursuant to subdivision (a) of Section 116906, with respect to all delinquent charges. (b) (1) If the conditions listed in subdivision (a) are met, the urban and community water system shall offer the customer one or more of the following options: (A) Amortization of the unpaid balance. (B) Participation in an alternative payment schedule. (C) A partial or full reduction of the unpaid balance financed without additional charges to other ratepayers. (D) Temporary deferral of payment. (2) The urban and community water system may choose which of the payment options described in paragraph (1) the customer undertakes and may set the parameters of that payment option. Ordinarily, the repayment option offered should result in repayment of any remaining outstanding balance within 12 months. An urban and community water system may grant a longer repayment period if it finds the longer period is necessary to avoid undue hardship to the customer based on the circumstances of the individual case. (3) Residential service may be discontinued no sooner than 5 business days after the urban and community water system posts a final notice of intent to disconnect service in a prominent and conspicuous</p>	CAW has implemented these compliance orders.	SB 998, Health & Safety Cod

Item	Status	Compliance Order	Comments	Decision/ Resolution
281	Completed	CA Health & Safety Code sec 116912. An urban and community water system that discontinues residential service for nonpayment shall provide the customer with information on how to restore residential service.	CAW has implemented this compliance order.	SB 998, Health & Safety Cod
282	Completed	CA Health & Safety Code sec 116914. (a) For a residential customer who demonstrates to an urban and community water system household income below 200 percent of the federal poverty line, the urban and community water system shall do both of the following (1) Set a reconnection of service fee for reconnection during normal operating hours at fifty dollars (\$50), but not to exceed the actual cost of reconnection if it is less. Reconnection fees shall be subject to an annual adjustment for changes in the Consumer Price Index beginning January 1, 2021. For the reconnection of residential service during nonoperational hours, an urban and community water system shall set a reconnection of service fee at one hundred fifty dollars (\$150), but not to exceed the actual cost of reconnection if it is less. Reconnection fees shall be subject to an annual adjustment for changes in the Consumer Price Index beginning January 1, 2021. (2) Waive interest charges on delinquent bills once every 12 months. (b) An urban and community water system shall deem a residential customer to have a household income below 200 percent of the federal poverty line if any member of the household is a current recipient of CalWORKs, CalFresh, general assistance, Medi-Cal, Supplemental Security Income/State Supplementary Payment Program, or California Special Supplemental Nutrition Program for Women, Infants, and Children, or the customer declares that the household's annual income is less than 200 percent of the federal poverty level.	CAW has had these processes in place prior to the passage of this code.	SB 998, Health & Safety Cod
283	Completed	CA Health & Safety Code sec 116916. (a) This section applies if there is a landlord-tenant relationship between the residential occupants and the owner, manager, or operator of the dwelling. (b) If an urban and community water system furnishes individually metered residential service to residential occupants of a detached single-family dwelling, a multiunit residential structure, mobilehome park, or permanent residential structure in a labor camp as defined in Section 17008, and the owner, manager, or operator of the dwelling, structure, or park is the customer of record, the urban and community water system shall make every good faith effort to inform the residential occupants, by means of written notice, when the account is in arrears that service will be terminated at least 10 days prior to the termination. The written notice shall further inform the residential occupants that they have the right to become customers, to whom the service will then be billed, without being required to pay any amount which may be due on the delinquent account. (c) The urban and community water system is not required to make service available to the residential occupants unless each residential occupant agrees to the terms and conditions of service and meets the requirements of law and the urban and community water system's rules and tariffs. However, if one or more of the residential occupants are willing and able to assume responsibility for the subsequent charges to the account to the satisfaction of the urban and community water system, or if there is a physical means legally available to the urban and community water system of selectively terminating service to those residential occupants who have not met the requirements of the urban and community water system's rules and tariffs, the urban and community water system shall make service available to those residential occupants who have met those requirements. (d) If prior service for a period of time is a condition for establishing credit with the urban and community water system, residence and proof of prompt payment of rent or other credit obligation acceptable to the urban and community water system for that period of time is a satisfactory equivalent. (e) Any residential occupant who becomes a customer of the urban and community water system pursuant to this section whose periodic payments, such as rental payments, include charges for residential water service, where those charges are not separately stated, may deduct from the periodic payment each payment period all reasonable charges paid to the urban and community water system for those services during the preceding payment period. (f) In the case of a detached single-family dwelling, the urban and	CAW has implemented these compliance orders.	SB 998, Health & Safety Cod
284	Ongoing	CA Health & Safety Code sec 116918. An urban and community water system shall report the number of annual discontinuations of residential service for inability to pay on the urban and community water system's Internet Web site, if an Internet Web site exists, and to the board. The board shall post on its Internet Web site the information reported.	CAW reports annually on its arrearage amounts and disconnections in its CPUC Annual Reports, which are publicly available. The company is evaluating posting the CPUC Annual Reports on its website.	SB 998, Health & Safety Cod

Item	Status	Compliance Order	Comments	Decision/ Resolution
285	Completed	CA Health & Safety Code sec 116922. All written notices required under this chapter shall be provided in English, the languages listed in Section 1632 of the Civil Code, and any other language spoken by 10 percent or more of the customers in the urban and community water system's service area.	CAW has implemented this compliance order.	SB 998, Health & Safety Cod
286	Completed	To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division (1) activation of their Catastrophic Event Memorandum Account (CEMA) effective to the date of the Governor's declaration of a state of emergency - March 4, 2020	California American Water filed AL 1284 on 3/19/2020 and AL 1294 on 5/1/2020 in compliance with this order.	Resolution M-4842
287	Completed	To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division (3) work cooperatively with affected customers to resolve unpaid bills, and minimize disconnections for non-payment;	California American Water filed AL 1284 on 3/19/2020 and AL 1294 on 5/1/2020 in compliance with this order.	Resolution M-4842
288	Completed	To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division (4) waive reconnection or facilities fees for customers and suspend deposits for customers who must reconnect to the system;	California American Water filed AL 1284 on 3/19/2020 and AL 1294 on 5/1/2020 in compliance with this order.	Resolution M-4842
289	Completed	To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division (5) provide reasonable payment options to customers;	California American Water filed AL 1284 on 3/19/2020 and AL 1294 on 5/1/2020 in compliance with this order.	Resolution M-4842
290	Completed	To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division (6) waive bills for victims who lost their homes or if their homes are rendered uninhabitable;	California American Water Filed AL 1284 on 3/19/2020 and AL 1294 on 5/1/2020 in compliance with this order.	Resolution M-4842
291	Completed	To the extent that they have not already done so in response to the Executive Director's March 17, 2020 letter, or to the extent to which their response was not fully responsive to the requirements of this Resolution, the water and sewer corporations subject to this Resolution shall file a Tier 2 Advice Letter no later than 15 days after this Resolution's approval demonstrating compliance to the Commission's Water Division (7) authorize a pro rata waiver of any fixed element of a water bill for the time that the home is uninhabitable, even if the reason for it being uninhabitable is not loss of water service.	California American Water Filed AL 1284 on 3/19/2020 and AL 1294 on 5/1/2020 in compliance with this order.	Resolution M-4842
292	Completed	Ordering Paragraphs 1. Public Water Now shall be awarded \$9,850.40; and 2. Within 30 days of the effective date of this decision, California-American Water Company shall pay Public Water Now the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning February 3, 2019, the 75th day after the filing of Public Water Now's request, and continuing until full payment is made.	On 9/18/2020, California American Water issued a payment to Public Water Now. On 1/14/2021 California American Water filed AL 1321 for recovery. AL 1321 was approved by the CPUC on 2/17/2021	D. 20-08-040
293	Completed	Ordering P. 1. In any future general rate case applications filed after the effective date of this decision, a water utility must discuss how these specific factors impact the sales forecast presented in the application(a) Impact of revenue collection and rate design on sales and revenue collection;	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047

Item	Status	Compliance Order	Comments	Decision/ Resolution
294	Completed	Ordering P. 2. Water utilities shall provide analysis in their next general rate case applications to determine the appropriate Tier 1 breakpoint that is not less than the baseline amount of water for basic human needs for each ratemaking area.	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047
295	Completed	Ordering P. 3. California-American Water Company, California Water Service Company, Golden State Water Company, Liberty Utilities (Park Water) Corporation, and Liberty Utilities (Apple Valley Ranchos Water) Corporation, in their next general rate case applications, shall not propose continuing existing Water Revenue Adjustment Mechanisms/Modified Cost Balancing Accounts but may propose to use Monterey-Style Water Revenue Adjustment Mechanisms and Incremental Cost Balancing Accounts.	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047
296	Completed	Order P. 4. Commission regulated water utilities shall name or rename their respective low-income water assistance program as "Customer Assistance Program" as part of their next general rate case applications. Water utilities with low-income programs shall describe their programs in filings and public outreach with the name "Customer Assistance Program." Water utilities may use the CAP acronym where appropriate.	This item has been completed.	D. 20-08-047
297	Completed	Ordering P. 5. California-American Water Company shall file a Tier 3 advice letter, within 120-days of the issuance of this decision, outlining a pilot program that provides a discount to water users in low-income multi-family through their housing providers.	California American Water filed AL 1320 on 1/4/2021 in compliance with this order. AL 1320 was suspended by the CPUC on 2/2/2021.	D. 20-08-047
298	Completed	Ordering P. 6. Each water utility shall comply with existing reporting requirements as summarized below Annual reporting requirements from Decision (D.) 11-05-004. To each Annual Report, reference Minimum Data Requests submitted in the prior year period as part of 1) General Rate Case (GRC) filing, 2) applications for acquisitions (or expansion based on new requirement in this decision). Compliance, and associated data and analysis with orders from D.14-10-047, and D.16-12-026 in each GRC filing. Inclusion of disconnection and payment behaviors required in this proceeding beginning in June 2020 through June 2021.	CAW is in compliance with annual reporting requirements from D.11-05.004. The 2021 Annual Report was filed in June 2022 and referenced the Minimum Data Requests as well as applications for acquisitions provided in the 2022 GRC. Compliance with orders from D.14-10-047 and D.16-12-026 are addressed in MDR's J.1 on Conservation Rate Design, J.2 on Low-income customers, K.1 Conservation Impacts, K.2 Proposals to promote conservation, and K.4 Water Action Plan principles. CAW adjusted its collection timeline and implemented a nonpay shutoff moratorium and stopped assessing late payment fees to customers effective March 2020 through September 2021.	D. 20-08-047
299	Completed	Ordering P. 7. In any application by a water utility for consolidation or acquisition of another system, the utility shall provide the information identified in Section 10, Water Consolidation Timelines, above as part of the application or with the Minimum Data Request in order to help streamline consideration of its application.	Information identified in Section 10 of D.20-08-047, Water Consolidation Timelines, was included in the Bass Lake application (A.22-03-002) that was subsequently filed after this decision. Future acquisition filings will continue to comply with this order.	D. 20-08-047
300	Completed	Ordering P. 1. The process identified in General Order 66-D and this decision shall be used for the submission of potentially confidential critical infrastructure information to the Commission.	CAW is complying with this requirement.	D. 20-08-031
301	Completed	Ordering P. 2. Any information submitter claiming the critical infrastructure information privilege must make the baseline showing specified in this decision.	CAW is complying with this requirement.	D. 20-08-031
302	Completed	Ordering P. 3. General Order 66-D is modified to include the baseline information requirements established in this decision for any information submitters claiming the critical infrastructure privilege, as specified in Attachment 1 (see Attachment 1 in Decision).	CAW is complying with this requirement.	D. 20-08-031
303	Ongoing	Ordering P. 1. In any future general rate case applications filed after the effective date of this decision, a water utility must discuss how these specific factors impact the sales forecast presented in the application (b) Impact of planned conservation programs;	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047
304	Ongoing	Ordering P. 1. In any future general rate case applications filed after the effective date of this decision, a water utility must discuss how these specific factors impact the sales forecast presented in the application (c) Changes in customer counts;	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047
305	Ongoing	Ordering P. 1. In any future general rate case applications filed after the effective date of this decision, a water utility must discuss how these specific factors impact the sales forecast presented in the application (d) Previous and upcoming changes to building codes requiring low flow fixtures and other water-saving measures, as well as any other relevant code changes;	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047

Item	Status	Compliance Order	Comments	Decision/ Resolution
306	Ongoing	Ordering P. 1. In any future general rate case applications filed after the effective date of this decision, a water utility must discuss how these specific factors impact the sales forecast presented in the application (e) Local and statewide trends in consumption, demographics, climate population density, and historic trends by ratemaking area;	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047
307	Ongoing	Ordering P. 1. In any future general rate case applications filed after the effective date of this decision, a water utility must discuss how these specific factors impact the sales forecast presented in the application (f) Past Sales Trends.	CAW addresses this requirement with the 2022 GRC Application.	D. 20-08-047
308	Ongoing	General Reminder that, per Ordering P. 1 - "The [CPUC] Enforcement Policy and its attached Penalty Assessment Policy, attached hereto, is adopted" and is being followed by California-American Water Company.	Cal-Am takes note of new enforcement and penalty assessment policy	Resolution M-4846
309	Completed	Appendix A, Settlement Agreement section 5.a. - 5. In lieu of continuing to seek authorization for imposition of a moratorium, and based on this, Agreement, California American Water will pursue the following plan. a. In a normal year with Aquifer Storage and Recovery water available, California American Water will pump groundwater from the Coastal Subbasin and deliver that groundwater for use in the Laguna Seca Subbasin, consistent with Section III.M.3.a., pp. 42-43 of the 2007 Amended Decision.	In compliance based on monthly reporting allocation of Coastal Subbasin water to meet needs of Laguna Seca Subbasin.	D. 20-11-022
310	Completed	Appendix A, Settlement Agreement, section 5.b. - 5. In lieu of continuing to seek authorization for imposition of a moratorium, and based on this Agreement, California American Water will pursue the following plan. b. Specifically, once the Main System/Ryan Ranch intertie project is complete, California American Water will supply the Ryan Ranch and Bishop service areas with water produced from the Coastal Subarea of the Basin, consistent with California American Water's allocation for the Coastal Subarea.	Complete based on retirement of wells that were separately serving Ryan Ranch and Bishop.	D. 20-11-022
311	Completed	Appendix A, Settlement Agreement section 5.c - 5. In lieu of continuing to seek authorization for imposition of a moratorium, and based on this Agreement, California American Water will pursue the following plan. c. California American Water will use its Standard Production and Carryover from its Laguna Seca Sub-basin allocation to meet or offset its Hidden Hills pumping.	In compliance based on monthly reporting allocation of Coastal Subbasin water to meet needs of Laguna Seca Subbasin.	D. 20-11-022
312	Completed	Appendix A, Settlement Agreement section 6.a - 6. Conservation a. California American Water agrees to research and remediate why the non-revenue water percentages in its Laguna Seca Subarea are higher than its Monterey Main System.	Reseraching of these systems did not show any clear indicators for higher NRW percentages. Ryan Ranch and Bishop are no longer able to be tracked separately as they are now part of the Monterey main system. We are in the process of checking any trends since the settlement Hidden Hills NRW.	D. 20-11-022
313	Completed	Appendix A, Settlement Agreement, section 6.b - 6. Conservation b. California American Water agrees to put signage rings on its fire hydrants in its Laguna Seca Subarea.	Signage rinks were added to hydrants in the Laguna Seca Subbasin area.	D. 20-11-022
314	Completed	Appendix A, Settlement Agreement, section 6.c. - 6. Conservation c. California American Water and MPWMD agree to jointly sponsor a workshop for California American Water's Laguna Seca customers on irrigation and efficient outdoor water use.	The workshop was conducted in 2020.	D. 20-11-022
315	Completed	Appendix A, Settlement Agreement, section 6.d. - 6. Conservation d. California American Water agrees to promote to California American Water's Laguna Seca customers California American Water's and MPWMD's existing joint rebate program, with an emphasis on turf removal.	The campaign in compliance with this order took place in 2020.	D. 20-11-022
316	Completed	Appendix A, Settlement Agreement, section 6.e. - 6. Conservation e. California American Water agrees to promote its Water Wise House Call program to its Laguna Seca customers.	The campaign in compliance with this order took place in 2020.	D. 20-11-022
317	Completed	Ordering Para. 3. Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, PacifiCorp, Bear Valley Electric Service (a division of Golden State Water Company LLC), and Liberty Utilities (CalPeco Electric), shall comply with all General Order (GO) 166 modifications as set forth in Attachment A and all regulated Class A, B, C, and D water companies shall comply with all GO 103-A modifications as set forth in Attachment B.	Cal Am utilizes an Emergency Response Plan for each district which is regularly monitored and revised. In accordance with General Order 103-A, the Emergency Response Plans are in compliance with state and federal requirements.	D. 21-05-019
318	Completed	Ordering Para. 4. Pursuant to Public Utilities Code § 768.6(a), the emergency preparedness plans of Class A and B water utilities shall address what measures the Class A and B water utilities intend to implement to mitigate the threat of severe weather; including, but not limited to high fire danger and windstorms. This may include the prepositioning of personnel and equipment to assure timely restoration of service or public safety in the event of severe anticipated weather.	Responding to threats of severe weather is included in Emergency Response Plans.	D. 21-05-019

Item	Status	Compliance Order	Comments	Decision/ Resolution
319	Ongoing	Ordering Para. 6. Public notice procedures are added to General Order 103-A which shall be consistent with the State Water Resources Control Board Division of Drinking Water Emergency Plan Guidance (Section 6.4 Public Notice Procedures).	CAW will comply with GO 13-A noticing requirements in an emergency	D. 21-05-019
320	Completed	Ordering Para. 7. All regulated Class A, B, C, and D water companies shall make their Emergency Response Plans available in languages other than English, that are predominantly spoken in each regulated water utility's service territory as required by the State Water Resources Control Board Division of Drinking Water and accessible to individuals with access and functional needs.	Cal Am Emergency Response Plans are company confidential documents, not available to the public, and written in a language of individuals that will use the ERP.	D. 21-05-019
321	Completed	Ordering Para. 14. General Order 166, Standard 1.D (External and Government Coordination) shall be modified to require that California's Standardized Emergency Management System (SEMS) be used by Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company. This shall be accomplished within one year of the adoption of this decision. Class A and B water utilities are required to adopt and participate in SEMS within one year from the date of this decision.	Cal Am utilizes the SEMS system by the implementation of an Incident Command System (ICS), coordinating with affected agencies including Counties and their sub divisions and participating in mutual aid through CalWarn.	D. 21-05-019
322	Completed	Ordering Para. 26. Emergency response plans of Class A, B, C and D water companies shall comply with the standards established by the Division of Drinking Water of the State Water Resources Control Board.	Cal Am Emergency Response Plans are in compliance with the Division of Drinking Water of the State Water Resources Control Board and reviewed annually.	D. 21-05-019
323	Ongoing	Ordering Para. 27. General Order 103-A shall be modified to require all Class A water companies to hold meetings when developing, adopting, or updating an Emergency Response Plan, or every five years, whichever comes first, with representatives from each tribal, city, county or city and county in the Class A water company's service area regarding their emergency plans.	California American Water remains in contact with emergency response agencies and will meet with agency representatives from each service area on a five year cycle to discuss emergency response planning.	D. 21-05-019
324	Ongoing	Ordering Para. 28. General Order 103-A shall be modified to require all Class B, C, and D water companies to confer when developing, adopting, or updating an Emergency Response Plan, or every five years, whichever comes first, with representatives from each tribal, city, county, or city and county in the Class B, C, and D water company's service area regarding their emergency plans.	California American Water remains in contact with emergency response agencies and will meet with agency representatives from each service area on a five year cycle to discuss emergency response planning.	D. 21-05-019
325	Completed	Ordering Para. 30. All Class B, C, and D water companies shall comply with the standards established by the Division of Drinking Water of the State Water Resources Control Board related to conducting field and table-top exercises.	Table-top exercises were conducted in all Districts in 2021	D. 21-05-019
326	Completed	Ordering Para. 32. California Public Utilities Commission Water Division staff shall continue to regularly monitor emergency preparedness plans for compliance with General Orders 103-A for all Class A, B, C, and D water companies.	Cal Am utilizes an Emergency Response Plan for each district which is regularly monitored and revised. In accordance with General Order 103-A, the Emergency Response Plans are in compliance with state and federal requirements.	D. 21-05-019
327	Completed	Ordering Para. 33. California Public Utilities Commission Water Division staff shall continue to ensure that all emergency response plans of Class A, B, C, and D water companies are filed, complete, and that any deviations from the standards established by the Division of Drinking Water of the State Water Resources Control Board are sufficiently justified.	Emergency Response Plans were updated in all Districts in 2021	D. 21-05-019
328	Ongoing	36. Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, PacifiCorp, Bear Valley Electric Service (a division of Golden State Water Company LLC), Liberty Utilities (CalPeco Electric), and all regulated Class A, B, C, and D water companies shall work with the Office of Access and Functional Needs at the California Governor's Office of Emergency Services to ensure that stakeholders can benefit from work that has already been conducted in this field and can utilize language and terminology that is recognized by emergency personnel.	During an emergency, Cal Am will work with affected agencies to address access and functional needs of customers and stakeholders. Key individuals are trained on the ICS system (ICS 100 and 700) to learn and utilize terminology recognized by emergency responders.	D. 21-05-019
329	Completed	Ordering Para. 37. All regulated Class A, B, C, and D water companies shall have emergency plans that address contingencies for temporary water supplies, such as water trucks and bottled water during an emergency.	Emergency response plans address contingencies for temporary water supplies.	D. 21-05-019
330	Ongoing	Ordering Para. 38. All regulated Class A, B, C, and D water companies shall have emergency plans that address how they will ensure that individuals with access and functional needs during an emergency will have access to water trucks and bottled water.	During an emergency, Cal Am will work with affected agencies to address access and functional needs of customers.	D. 21-05-019

Item	Status	Compliance Order	Comments	Decision/ Resolution
331	Completed	Ordering Para. 1. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company (Class As) shall suspend disconnection for past-due amounts billed to residential customers between March 2020 and the end-date of the water disconnection moratorium until the sooner of (1) further notice and direction from the Commission, or (2) February 1, 2022. If it is not possible to distinguish past-due amounts by month billed, the Class As shall not pursue collection on any past-due amounts billed to residential customers prior to the end-date of the water disconnection moratorium, until the sooner of (1) further notice and direction from the Commission, or (2) February 1, 2022.	CAW implemented a nonpay shutoff moratorium and stopped assessing late payment fees to customers effective March 2020 through September 2021.	D. 21-07-029
332	Completed	Ordering Para. 2. Within 30 days of the issuance of this decision, regarding the Customer Assistance Program, California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall a. Increase the frequency of low-income customer data exchanges between water and energy utilities to quarterly; b. Conduct meetings annually dedicated to pursuing improvements to the low-income customer data exchange process, with the agenda of the first annual meeting which shall include (1) Increasing the number of enrollment methods that each water utility offers to customers; and (2) Strategic planning by overlapping water and energy utilities to facilitate customer access to state and federal assistance and relief programs; and c. Maintain updated contact lists for individuals at each utility integral to the low-income customer data exchange process.	Beginning in 2022, CAW held several meetings with mutual energy providers to implement quarterly low-income data sharing. The data exchanges will take place quarterly in 2022.	D. 21-07-029
333	Open	Ordering Para. 7. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall not file for recovery of unpaid bills associated with the COVID-19 pandemic tracked in their Catastrophic Event Memorandum Accounts at least until state and federal funding appropriated in the California 2021/22 state budget for COVID-19 water utility bill relief has been disbursed and applied to customer accounts.	CAW is currently evaluating the rules for this item as it pertains to the company's position. The expectation is that rules are resolved in the future so that appropriate steps may be taken to ensure compliance with this item.	D. 21-07-029
334	Completed	Ordering Para. 8. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall record payments on unpaid bills associated with the COVID-19 pandemic in their Catastrophic Event Memorandum Accounts.	Done, there are 2 accounts for the CEMA, 18680220 and 18680228.	D. 21-07-029
335	Ongoing	Ordering Para. 9. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company, shall offset the unpaid bill amounts tracked in their Catastrophic Event Memorandum Accounts by their uncollectible allowance rate in 2020 and 2021 increased by 0.0867 percent.	This has been done on CA's books in April 2022.	D. 21-07-029
336	Completed	Ordering Para. 10. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall continue filing in the docket of Rulemaking 17-06-024 monthly, the billing and collections data required in this proceeding until further notice and direction from the Commission.	CAW files monthly reporting with the CPUC to satisfy this requirement.	D. 21-07-029
337	Completed	Ordering Para. 11. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall immediately begin including in their monthly billing and collections data reports the number and percentage of customers disconnected for nonpayment and reconnected.	CAW files monthly reporting with the CPUC to satisfy this requirement.	D. 21-07-029
338	Completed	Ordering Para. 12. Within 45 days of the issuance of this decision, California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall participate in a minimum of four data reporting working sessions to be held at least monthly, for tracking and refinement of billing and collections data reporting. The Water Division will schedule and conduct the working sessions. The working sessions will consider reporting changes identified in Attachment A to this decision and shall pursue consistency between State Water Board and Commission required data reporting by water utilities.	CAW participated and provided input in CPUC-hosted data reporting working sessions.	D. 21-07-029

Item	Status	Compliance Order	Comments	Decision/ Resolution
339	Completed	Ordering Para. 13. California Water Service Company, Golden State Water Company, San Jose Water Company, California-American Water Company, San Gabriel Valley Water Company, Suburban Water Systems, Liberty Utilities, and Great Oaks Water Company shall file, as compliance filing, in Rulemaking 17-06-024 or its successor proceeding, copies of all future compliance advice letters submitted pursuant to Commission Resolution M-4843, until further notice and direction from the Commission.	CAW has complied with this order.	D. 21-07-029
340	Completed	Ordering Para. 3. California-American Water Company (Cal-Am) is authorized to include the \$34,000,000 purchase price, plus or minus any adjustment amounts within the purchase agreement, of East Pasadena Water Company in Cal-Am's rate base in a subsequent 2024 general rate case proceeding. Cal-Am shall address the long-term ratemaking treatment of the acquired intangible assets in that proceeding.	CAW will address this requirement with the 2022 GRC Application.	D. 21-08-002
341	Completed	Ordering Para. 4. California-American Water Company, in its next 2024 general rate case, shall consolidate East Pasadena Water Company in its tariffs for ratemaking purposes.	CAW is complying with this order in its 2022 GRC.	D. 21-08-002
342	Completed	Ordering Para. 6. Existing rates for customers of the East Pasadena Water Company shall remain in effect until subsequently modified by this Commission.	Cal Am filed AL 1347 on 9/21/2021 which integrated the E Pasadena rates into Cal Am tariffs in compliance with this order.	D. 21-08-002
343	Completed	Ordering Para. 7. California-American Water Company shall file within 10 days of this decision a Tier 1 Advice Letter to establish an East Pasadena Transaction Cost Memorandum Account and to include East Pasadena in its existing Memorandum Account for Environmental Improvement and Compliance Issues for Acquisitions.	CAW filed AL 1344 on 8/13/2021 and it was approved 9/17/2021.	D. 21-08-002
344	Completed	Ordering Para. 9. Until California-American Water Company files its 2024 general rate case proceeding, the rates in the East Pasadena Water System service area shall remain in effect subject to existing authority to file for rate increases using the Commission's advice letter process.	CAW is complying with this order in its 2022 GRC.	D. 21-08-002
345	Completed	Ordering Para. 11. Within 10 days of the completion of the sale by the East Pasadena Water Company (East Pasadena) to California-American Water Company (Cal-Am) of all of the assets included in the Asset Purchase Agreement, Cal-Am and East Pasadena shall notify the Commission's Water Division that the sale has been completed.	On September 30, 2021 CAW provided notice to the CPUC's Water Division that, on or about September 21, 2021, sale of East Pasadena's assets included in the above-referenced Asset Purchase Agreement, was completed.	D. 21-08-002
346	Completed	Ordering Para. 1. The settlement agreement between Myriam Morris and California American Water, as provided in Attachment A of this decision, is approved.	In March of 2021, CAW executed the settlement agreement with Myriam Morris.	D. 21-08-010
347	Completed	Ordering Para. 2. California American Water Company will separate the accounts for Myriam Morris' two properties, by creating a separate customer number for each property, within 20 days of the issuance date of this decision.	This was completed and detailed in the March 2021 settlement agreement with Myriam Morris.	D. 21-08-010
348	Ongoing	Deadline to provide City of Thousand Oaks: 1. Copy of the Annual CPUC Report 2. Copy of Annual EAR Report 3. Copy of Annual CCR 4. Customer service data 5. Call Center performance, and operation, including wait time and dropped calls 6. Any regulatory agency NOV's (only as needed)	All required data and reports were sent to the City of Thousand Oaks in August 2021 for the 2020 reporting year. CAW intends to comply with this requirement as request on an annual basis going forward.	ORDINANCE NO. 1685-NS
349	Completed	Ordering Paragraph 3. No later than 30 days following the issuance of this Decision, California American Water Company (Cal-Am) shall file its Tier 1 General Rate Case implementation advice letter, including updated tariffs as necessary to reflect all of the agreements related to capital expenditures and projects in the Los Angeles County, San Diego County, Ventura County, Central Division, Monterey County Wastewater, Sacramento County, and Larkfield Districts reached between the Public Advocates Office of the California Public Utilities Commission; the Cities of Duarte, San Marino, and Thousand Oaks; the Las Palmas Wastewater Committee; the Monterey Peninsula Water Management District; and Cal-Am. Given the timing of the issuance of the decision, the 2021 authorized rates and tariff changes shall be implemented concurrently with California American Water's escalation filing for attrition year 2022.	CAW filed AL 1353 on 12/23/2021 and it was approved 2/23/2022.	D. 21-11-018
350	Completed	Ordering Paragraph 4. California-American Water Company (Cal-Am) is authorized to revise tariff schedules and to concurrently cancel its present schedules for such service upon the effective date of its 2022 escalation filing. The revision of tariff schedules for authorized rates in 2021 shall be included and subsumed in Cal-Am's escalation filing for attrition year 2022.	CAW filed advice letters 1356, 1357, 1358, and 69-S in compliance with this order.	D. 21-11-018
351	Completed	Ordering Paragraph 5. Decision 07-05-062 requires escalation filings to be filed no later than 45 days prior to the start of the escalation year. In light of the effective date of this decision, California-American Water Company shall submit its 2022 escalation advice letters within 60 days from the effective date of this decision. The 2022 escalation advice letters shall be effective 45 days from the date of filing.	CAW filed advice letters 1356, 1357, 1358, and 69-S in compliance with this order.	D. 21-11-018
352	Ongoing	Ordering Paragraph 6. California-American Water Company shall submit its 2023 escalation advice letters no later than 45 days prior to their effective date on January 1, 2023.	CAW will comply with this order.	D. 21-11-018

Item	Status	Compliance Order	Comments	Decision/ Resolution
353	Completed	Ordering Paragraph 7. The Annual Consumption Adjustment Mechanism (ACAM) filings for 2022 shall be filed concurrently with the 2022 Escalation filings via Tier 2 advice letters as approved in Settlement 1. The ACAM filings shall be submitted 60 days from the effective date of this decision. Upon approval of the Tier 2 advice letter, California American Water will file a Tier 1 advice letter to implement new rates effective 45 days after the Tier 2 filing.	CAW filed Advice Letters 1359, 1360, and 1361 in compliance with this order.	D. 21-11-018
354	Completed	Ordering Paragraph 8. The Annual Consumption Adjustment Mechanism (ACAM) filings for 2022 shall be filed concurrently with the 2022 Escalation filings via Tier 2 advice letters as approved in Settlement 1. The ACAM filings shall be submitted 60 days from the effective date of this decision. Upon approval of the Tier 2 advice letter, California American Water will file a Tier 1 advice letter to implement new rates effective 45 days after the Tier 2 filing.	CAW filed Advice Letters 1359, 1360, and 1361 in compliance with this order.	D. 21-11-018
355	Completed	Ordering Paragraph 9. California American Water Company shall not recover any costs associated with its proposed Bellflower acquisition until or unless it is ultimately approved by the Commission.	CAW has not recovered any costs associated with the propose Bellflower acquisition.	D. 21-11-018
356	Ongoing	Ordering Paragraph 10. California American Water Company shall continue to regularly share data with electric investor-owned utilities to identify customers that may be eligible to enroll in its low-income assistance programs, pursuant to Decision 21-06-015.	CAW is preparing to share data with energy utilities on a quarterly basis. The program is being created currently and is set to launch in 2022.	D. 21-11-018
357	Ongoing	Ordering Paragraph 11. California American Water Company shall prepare a Portable Generator Planning Study to consider alternatives to installing stationary generators at its facilities and budget \$150,000 or \$50,000 per Division, as a planning study expense in Test Year 2021 to complete this portable generator planning study.	The generator study is underway and will be complete in 2022.	D. 21-11-018
358	Ongoing	Ordering Paragraph 12. California American Water may recover costs associated with drilling a new well at the Sand City Desalination Plant.	A new source water well project is underway and is expected to be completed in 2022 or 2023.	D. 22-01-020
359	Completed	Ordering Paragraph 13. California American Water Company shall coordinate with Monterey Peninsula Water Management District to identify and prioritize projects to improve service and lower costs in the Monterey District prior to filing its next General Rate Case application.	CAW met with MPWMD via Teams on 3-30-22 to Coordinate GRC Filing Items	D. 21-11-018
360	Completed	Ordering Paragraph 14. California American Water Company shall consolidate its Southern Division as agreed to in Section 12.1 of the Settlement and shall design its Southern Division rates so customers with median and below-median consumption will not see more than the average system-wide increase in monthly bills.	CAW filed AL 1353 on 12/23/2021 and complied with this order. AL 1353 was approved on 2/23/2022.	D. 21-11-018
361	Completed	Ordering Paragraph 15. California American Water Company shall recover the 2017 Larkfield Wildfire related costs, net of received insurance claims, on a statewide basis.	Revenue requirement adopted in D.21-11-018 incorporated statewide cost recovery of Larkfield Wildfire related costs net of received insurance claims	D. 21-11-018
362	Completed	Ordering Paragraph 16. California American Water Company shall seek recovery of any wildfire-related costs incurred after May 31, 2019, on a statewide basis, pursuant to the provisions adopted in Decision 19-07-015.	Statewide recovery for wildfire-related costs were allocated statewide in the revenue requirement and CEMA recovery authorized in D.21-11-018. Further, such costs will be proposed for statewide allocation in the upcoming GRC filing.	D. 21-11-018
363	Completed	Ordering Paragraph 17. In its next General Rate Case application, California American Water Company shall report details on the surcharges in each district, the customer bill impacts related to the surcharges, and the improvements and efficiencies each surcharge is intended to fund.	Cal Am is complying with this order in its 2022 GRC filing.	D. 21-11-018
364	Ongoing	Ordering Paragraph 18. California American Water Company (Cal-Am) shall use conservation budget funds to match any funds San Marino receives from the Metropolitan Water District of Southern California (MWD) incentive program, assist San Marino City staff with applying for and reporting program(s) to MWD, work with San Marino to implement a community outreach program to educate and inform residents on the programs and classes they can participate in to lower indoor and outdoor water use to reduce their monthly water bills, and meet with the City of San Marino prior to Cal-Am's next General Rate Case filing to discuss potential new projects or infrastructure improvements that would benefit the San Marino water system.	CAW has reached out to the City of San Marino multiple times. The City of San Marino has not yet applied for MWD funding; however, in the event that occurs, CAW will comply with this order.	D. 21-11-018
365	Completed	Ordering Paragraph 19. California American Water Company shall continue collecting the Monterey Peninsula Water Management District user fee during this General Rate Case cycle to support environmental mitigation, water conservation, and other water service-related programs that were authorized in Decision 17-01-013.	CAW is complying with this order.	D. 21-11-018
366	Completed	Cal-Am shall provide information on its website and outreach through billing inserts that explain the new rate design to high-usage customers in the Monterey District that may experience higher rates under the new tier structures.	Complete, CAW has launched bill onserts and updated the website with information about changes to rates and rate design	D. 21-11-018

Item	Status	Compliance Order	Comments	Decision/ Resolution
367	Ongoing	Accordingly, Cal-Am should expand its Hardship Assistance Program to its service territories across California, may recover up to 50% of the costs associated with it from ratepayers, and shall modify its Hardship Assistance Program to align with the terms of the Settlement. Cal-Am should also ensure its expanded Hardship Assistance Program aligns with the criteria set forth in D.11-05-020, as modified by D.21-07-029.D.21-07-029 requires Class A water utilities to participate in a series of data reporting working sessions sponsored by the Commission's Water Division, to review and collaborate toward reconciling, refining and devising a consistent and clear set of requirements for reporting billing and collections data, which are being required pursuant to the decision and the ongoing evaluation of water affordability in Rulemaking (R.) 17-06-024.	Current work is underway to set up contracts and agreements with local United Way chapters to expand the program in all of CAW's service areas.	D. 21-11-018
368	Ongoing	Cal-Am shall continue its collaboration with Commission regulated energy utilities to ensure customers that have enrolled in low-income energy programs are aware of the CAP program, the Hardship Assistance Program, and any other assistance programs Cal-Am offers to support low- and moderate-income customers to reduce water consumption and otherwise lower their water bills.	CAW is preparing to share data with energy utilities on a quarterly basis. The program is being created currently and is set to launch in 2022.	D. 21-11-018
369	Completed	Forecasted Number of Customer Meters - CAW and Cal Advocates agree that CAW shall incorporate actual meter counts in step rate advice letter filings for escalation years 2022 and 2023. CAW will incorporate meter counts based on actual number of meters by meter size as of September 30th of the filing year (i.e. September 30th, 2021 for 2022 step filing and September 30th, 2022 for 2023 step filing). Pursuant to the standard escalation methodology adopted in the Rate Case Plan, incorporation of Fruitridge meter count will not impact authorized revenue requirement in the step rate filings, but only allocation of that authorized revenue requirement.	Cal Am complied with this its 2022 Step filing and will comply in its 2023 Step filing.	D. 21-11-018
370	Completed	Purchased Water (Acct 704) - CAW and Cal Advocates agree to adopt Cal Advocates' methodology to include projected wholesale purchased water rate increases in the estimated Test Year 2021 Purchased Water expense, with the exclusion of purchased water expenses related to the Pure Water Monterey Purchased Water Agreement as described below. No additional escalation is included for escalation years 2022 and 2023. Wholesale water offsets for 2022 and 2023 will be implemented via offset advice letters as authorized by Pub. Util. Code § 792.5 and General Order ("GO") 96-B. Future purchased water offsets related to Pure Water Monterey Purchased Water Agreement in the Monterey Main service area will be implemented via purchased water offset with a separately identified surcharge.	Forecasted purchased water expense adopted in D.21-11-018 incorporated projected wholesale purchased water rates for the test year 2021	D. 21-11-018
371	Completed	Operating Expenses for Acquired Systems - CAW and Cal Advocates agree to adopt CAW's forecasted incremental operating expenses for Fruitridge Vista, Rio Plaza, and Hillview acquisitions as reflected in CAW's 100 Day Update. CAW and Cal Advocates agree to remove incremental operating expenses for the Bellflower system to reflect the Proposed Decision in CAW's Bellflower acquisition proceeding A.18-09-013 issued on March 30, 2020. However, if the final decision in proceeding A.18-09-013 instead authorizes CAW to acquire the Bellflower system, then the final decision in this GRC shall include the incremental operating expenses for the Bellflower system.	Authorized revenue requirement adopted in D.21-11-018 incorporated incremental operating expenses for Fruitridge Vista, Rio Plaza, and Hillview acquisitions. The CPUC has not authorized the Bellflower acquisition, so incremental expenses related to that system are not included in revenue requirement at this time.	D. 21-11-018
372	Completed	Conservation - CAW and Cal Advocates agree that CAW will have flexibility and discretion to utilize conservation budget where needed, and within the three-year rate case cycle, similar to other forecasted capital or expense budgets. The Monterey District is the sole district where the approved conservation funding will need to be spent within that district only. There will be flexibility and discretion to utilize the conservation budget where needed and within the three-year rate case cycle but only within the Monterey District for those approved funds.	Conservation funds are distributed according to D.21-11-018.	D. 21-11-018
373	Completed	Conservation - CAW and Cal Advocates agree to eliminate the conservation funding surcharge and close the California American Water Conservation Surcharge Balancing Account effective December 31, 2020. However, as discussed in Section 11.9 of the Settlement Agreement, CAW and Cal Advocates agree that any trailing interest charges associated with the Conservation Surcharge Balancing Accounts up to approval of the GRC implementation advice letter filing will be transferred to the Consolidated Expense Balancing Account ("CEBA").	CAW stopped collecting the conservation surcharge in late November 2020 through Advice Letter 1316. CAW closed the conservation balancing account through AL 1353.	D. 21-11-018
374	Completed	Allocation of CAW General Office to Hawaii American Water Company - CAW and Cal Advocates agree to include \$650,000 of General Office allocation to HAWC as an offset addressing the General Office Labor, other expenses, and utility plant in service. CAW and Cal Advocates agree to remove the associated adjustment from the capitalized labor forecast. CAW will provide all employees information and expanded training pertaining to the process and importance of accurately recording time for cost allocation purposes.	The allocation of GO costs to Hawaii American Water was incorporated into the revenue requirement adopted in D.21-11-018	D. 21-11-018

Item	Status	Compliance Order	Comments	Decision/ Resolution
375	Completed	Allocation of CAW General Office to Hawaii American Water Company - As part of its next GRC, CAW will provide a copy of the information provided to all employees pertaining to recording time and cost allocation. As part of its next GRC, CAW will provide a summary of employee time recorded to operations outside of California-regulated operations for the period 2019-2021. As part of its next GRC, CAW will also provide a detailed summary of the specific General Office expenses and assets that are appropriately allocated to operations outside of California-regulated operations.	CAW will address this requirement in the 2022 GRC	D. 21-11-018
376	Completed	Supervisor Pay Differential - CAW agrees to monitor the employment and economic impacts associated with the COVID-19 pandemic and the associated economic challenges and propose appropriate measures (including Salary Differential) as needed in a future GRC.	CAW is cognizant of the continuing issues surrounding the hiring of employees at the supervisor level and will continue to address this issue within the current pay scale structure.	D. 21-11-018
377	Ongoing	Project I15-500009 (Previously IP-0550-118) – LA Santa Fe Well Replacement (CARRY-OVER) - CAW and Cal Advocates agree that for the purposes of determining rate base for 2021, 2022, and 2023, in this proceeding and for this rate case cycle only, the spend on these projects will not be included in rate base (or in the revenue requirements). In lieu of including the proposed accumulated spend in rate base, CAW and Cal Advocates agree that CAW will be able to capitalize the carrying cost (AFUDC) of the project's reasonable and prudent costs into the project's overall cost from January 1, 2021 up until the time the project is completed and in service and then capture separately in an off book regulatory account the carry cost of the project from the time it is completed until it goes into rates and rate base. During construction, AFUDC will be calculated based on the weighted average authorized cost of debt in effect for the relevant time period. Once in service but before allowed into rate base, AFUDC will be calculated based on the authorized average authorized cost of debt in effect for the relevant time period.	We have now shifted the planned redrill of this well to rehabilitation and probable treatment options to bring the Santa Fe Well back into service. Continual monitoring of the PFOA levels at this well site will be performed, and planned treatment options will be considered for the well. Rehabilitation efforts for the well have started in 2022. Further details are provided in the testimony of Ian Crooks.	D. 21-11-018
378	Completed	Project I15-500032 – Winston Well Redrill and Treatment (CARRY-OVER) - CAW and Cal Advocates agree that for the purposes of determining rate base for 2021, 2022, and 2023, in this proceeding and for this rate case cycle only, the spend on this project will not be included in rate base (or in the revenue requirements). In lieu of including the proposed accumulated spend in rate base, CAW and Cal Advocates agree CAW will be able to capitalize the carrying cost (AFUDC) of the project's reasonable and prudent costs into the project's overall cost from January 1, 2021 up until the time the project is completed and in service and then capture separately in an off book regulatory account the carry cost of the project from the time it is completed until it goes into rates and rate base. During construction, AFUDC will be calculated based on the weighted average authorized cost of debt in effect for the relevant time period. Once in service but before allowed into rate base, AFUDC will be calculated based on the authorized average authorized cost of debt in effect for the relevant time period.	This project is cancelled. This project was delayed due to San Gabriel County Water District ("SGCWD") contesting the drilling of the well at this location as they had concerns it would influence or interfere with the production of one of their wells nearby. Further details are provided in the testimony of Ian Crooks.	D. 21-11-018
379	Ongoing	Project I15-500036 – Longden Well Redrill and Rehabilitation (CARRY-OVER) - CAW and Cal Advocates agree that for the purposes of determining rate base for 2021, 2022, and 2023, in this proceeding and for this rate case cycle only, the spend on this project will not be included in rate base (or in the revenue requirements). In lieu of including the proposed accumulated spend in rate base, CAW and Cal Advocates agree that CAW will be able to capitalize the carrying cost (AFUDC) of the project's reasonable and prudent costs into the project's overall cost from January 1, 2021 up until the time the project is completed and in service and then capture separately in an off-book regulatory account the carry cost of the project from the time it is completed until it goes into rates and rate base. During construction, AFUDC will be calculated based on the weighted average authorized cost of debt in effect for the relevant time period. Once in service but before allowed into rate base, AFUDC will be calculated based on the authorized average authorized cost of debt in effect for the relevant time period.	This project is currently in the design and permitting phase for Reverse Osmosis ("RO") treatment as the well is now offline and cannot be run due to contamination with multiple constituents. Further details are provided in the testimony of Ian Crooks.	D. 21-11-018

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380	Completed	Project I15-500030 (Previously IP-0550-38) – Oswego Well Replacement and Treatment (CARRY-OVER) - CAW and Cal Advocates agree that for the purposes of determining rate base for 2021, 2022, and 2023, in this proceeding and for this rate case cycle only, the spend on this project will not be included in rate base (or in the revenue requirements). In lieu of including the proposed accumulated spend in rate base, CAW and Cal Advocates agree that CAW will be able to capitalize the carrying cost (AFUDC) of the project's reasonable and prudent costs into the project's overall cost from January 1, 2021 up until the time the project is completed and in service and then capture separately in an off-book regulatory account the carry cost of the project from the time it is completed until it goes into rates and rate base. During construction, AFUDC will be calculated based on the weighted average authorized cost of debt in effect for the relevant time period. Once in service but before allowed into rate base, AFUDC will be calculated based on the authorized average authorized cost of debt in effect for the relevant time period.	This project is cancelled.	D. 21-11-018
381	Completed	Project I15-500006 - Lamanda Well Redrill Project - CAW and Cal Advocates agree that \$96,200 of design costs incurred should be amortized over this GRC cycle (2021-2023) as this project was designed under the same contract as other wells in this area. This common design effort led to common project specifications and economies of scale that benefited other designs completed under the same contract. Additionally, CAW and Cal Advocates agree that \$68,000 of costs incurred for demolition of the existing well should be authorized for treatment as cost of removal as this work was not necessitated by the well redrill failure, but rather was necessary to abandon the existing well. The remaining project costs totaling \$810,800, will not be included in rate base and will not be recovered from ratepayers.	This project was cancelled in the 2021-2023 GRC after failure of the well during the drilling process.	D. 21-11-018
382	Ongoing	Project I15-500071 – Tank Rehabilitation and Seismic Upgrades Program (2022-2026) (PROPOSED) - CAW agrees to complete a seismic study on tanks in the Los Angeles County District prior to initiating seismic upgrades to tanks. The proposed project and cost recovery will be deferred to the next GRC.	The seismic study is underway and will be complete in 2022.	D. 21-11-018
383	Completed	Project I15-500067 – Annual Well Installation and Replacement Program (2022-2026) (PROPOSED) - CAW agrees to adopt Cal Advocates' position on this contested project and remove the 2022 forecasted budget in this GRC cycle. CAW has agreed with San Marino to request this capital project in the next GRC.	Request is being made for funding in 2022 GRC filing.	D. 21-11-018
384	Ongoing	Project I15-600094 – Nut Plains Well PFOA Treatment (COMPLETED) - Based upon no objection to the need for the project, as it was approved in the 2016 GRC, and as there is an indeterminate timeframe for pending litigation, CAW and Cal Advocates agree that costs related to the Nut Plains Well PFAS Treatment (I15-6000094) should be included in rate base. In the event CAW does obtain monetary recovery through litigation to recover Nut Plains treatment facility costs, the Company agrees to seek approval to allocate any net proceeds after all costs have been determined, in accordance with D.10-10-018. CAW will file a Tier 2 Advice Letter seeking approval of its proposed allocation within 90 days of receipt of proceeds from any final damage award or settlement.	CAW has not received monetary recovery through litigation as of April 2022.	D. 21-11-018
385	Open	Recurring Projects – Corporate General Office - Cal Am accepts the recommendation to separately identify costs for unique software application projects and present them as separate programs and projects.	Need to check with Wes and others who are working with Corporate IT group to develop testimony.	D. 21-11-018
386	Completed	Facilities Addressed in D.18-12-021 - CAW and Cal Advocates agree that the Scotland Well, Wittkop Well, and Sutter Gold Well facilities should be retired and reflected as such in rate base. CAW and Cal Advocates do not dispute the potential future need for the Fish Passage Well, Roanoke Well, and associated land, but do agree that timeline for return to used and useful service is uncertain and so they should not be included in rate base in this GRC cycle. However, as there is a definite plan for returning the facilities to use CAW and Cal Advocates agree to move the assets to USOA Account #100-4: Utility Plant Held for Future Use for this GRC cycle. See Attachment C-5 for resolution by asset.	Identified rate base adjustments were incorporated into the authorized rate base for capital test years 2021 and 2022 as established in D.18-12-021	D. 21-11-018

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387	Completed	"TBD" Land Identified in D.18-12-021 - CAW and Cal Advocates agree that the \$803,165 categorized as "Used and Useful" should be authorized for inclusion in rate base. CAW and Cal Advocates do not dispute the potential future need for the land categorized as "Vacant Property – Future Well Site" totaling \$264,811 but do agree that timeline for return to used and useful service is uncertain and so they should not be included in rate base in this GRC cycle. However, as there is a definite plan for returning the facilities to use CAW and Cal Advocates agree to move the assets to USOA Account #100-4: Utility Plant Held for Future Use for this GRC cycle. Remaining "TBD" property, totaling \$67,394, should be moved out of utility plant in service. See Attachment C-5 for resolution by parcel.	Identified rate base adjustments were incorporated into the authorized rate base for capital test years 2021 and 2022 as established in D.18-12-021	D. 21-11-018
388	Open	Special Request #11: Acquisition Revenue Requirement Normalization - CAW and Cal Advocates agree to allocate the UPAA across all ratemaking areas for the acquisitions of Fruitridge Vista, Rio Plaza, and Hillview. CAW and Cal Advocates agree to remove costs associated with the Bellflower acquisition and that inclusion would be reflected based on the final decision in that proceeding such that if the acquisition is approved prior to a Decision in this GRC the settlement will be updated accordingly. If the acquisition is approved subsequent to a Decision in this GRC, Cal Am may file a Tier 2 advice letter to incorporate approval into authorized rates. If the acquisition is denied, no action is necessary. See Section 5.11 of the Settlement Agreement for the assumptions regarding incremental operating expenses for these acquisitions. Duarte agrees with this resolution.	Authorized acquisition rate base normalization was incorporated into the authorized revenue requirement and rate base established in D.21-11-018. The Bellflower acquisition has not been approved at this time and is not included in CAW authorized revenue requirement or rate base.	D. 21-11-018
389	Completed	Special Request #14: Elimination of Duplicative or Unnecessary Reporting - CAW requested authorization to eliminate duplicative or unnecessary reporting by the elimination of (1) the Monterey District rebate and audit reports required by D.09-05-029, and (2) the customer complaint reports required by D.06-11-050.... CAW and Cal Advocates agree that the Commission should grant Special Request #14.	Starting in Q1 of 2021, the Annual Monterey Conservation Report did not include the duplicative reporting outlined in A.19-07-004.	D. 21-11-018
390	Open	Special Request #15: Proposed Operational Tariff Modifications - Regarding the AMI/AMR opt out tariff revisions, CAW and Cal Advocates agree to the following: 1.CAW will offer customers the option to opt out of AMI before installing AMI meters. Customers who choose to opt out prior to AMI installation will not be charged the \$70.00 initial fee provided on the Schedule No. CA-OUT exemplary tariff, however these customers will be charged the \$13.00 monthly charge upon full implementation of billing with AMI meters. 2.CAW will file a Tier 1 AL to make Schedule No. CA-OUT effective no more than 90 days prior to the start of billing utilizing AMI meters. 3.CAW and Cal Advocates agree that revenues generated through the charges provided in Schedule No. CA-OUT should be treated as Other Revenue, however due to the anticipated timing of AMI implementation in late 2023 CAW and Cal Advocates agree that any revenues received through the opt out tariff will be minimal in this GRC cycle (2021-2023) and cannot be accurately forecasted for inclusion in authorized revenue requirement.	CAW is implementation all provisions as stipulated. AL [TBD] was filed on [TBD] to implement the Opt Out tariff as set forth in D.21-11-018.	D. 21-11-018
391	Ongoing	Special Request #16: Lead Service Line Replacement Program - CAW requested authorization to create a Lead Service Line Replacement Program as part of its ongoing main replacement program that would replace the entire lead portion of the service line (both Company and customer-owned) when service lines containing lead are discovered. CAW and Cal Advocates do not dispute that the Commission should grant Special Request #16. CAW will maintain detailed records pertaining to all lead service line replacements, including the location, length, and cost of each customer-owned service line replaced.	CAW will continue to monitor and maintain detailed customer records regarding lead service line replacements on the customers' side when and if they occur.	D. 21-11-018
392	Completed	Water Quality - CAW and Cal Advocates agree to adopt CAW's requested cost recovery for bi-annual tank inspections. CAW and Cal Advocates further agree that CAW will continue to incorporate unmanned drone inspections, including inspection of vent screens and tank hatches where feasible. Finally, CAW and Cal Advocates agree that a notification system for water quality sampling and reporting will be incorporated into the SAMS program and the companywide Horizon Laboratory Information Management System.	CAW is continuing to incorporate drone inspections. A notification system is in place in SAMS where samples are tracked and alerts are built-in to flag out-of-bounds data entries.	D. 21-11-018
393	Completed	Customer Service - CAW and Cal Advocates agree that CAW has taken action to improve customer service metrics from 2018 performance levels and that these metrics should again be reviewed in the next GRC scheduled to be filed in July 2022 for the 2024 test year.	The customer service metrics are reviewed in the testimony of Patrick Pilz in CAW's 2022 GRC	D. 21-11-018

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394	Completed	Compliance with Ordering Paragraphs in D.18-12-021 - CAW demonstrated that it has complied with Ordering Paragraphs 21 and 22 and rehabilitated Lower Pasadera Tank, Upper Pasadera Tank #1, Upper Pasadera Tank #2, Huckleberry Tank #2, Boots Tank, Forest Lake Tank #2, and High Meadows Tank #1 as ordered by the Commission in D.18-12-021. CAW provided such information in this GRC as directed by those Ordering Paragraphs in D.18-12-021.... CAW and Cal Advocates agree that CAW has complied with Ordering Paragraphs 21 and 22 of D.18-12-021.	Completed	D. 21-11-018
395	Open	Regulatory Compliance - CAW and Cal Advocates do not dispute that CAW has provided appropriate documentation to demonstrate compliance and that the process established by CAW to ensure compliance is reasonable. The documentation provided in Attachment 1 to the Direct Testimony of CAW's witness, Wes Owens is comprehensive of known compliance items. CAW and Cal Advocates agree that it is appropriate to remove the items shown as "completed" from the list to be provided in the next GRC.	Items shown as "completed" in A.19-07-004 have been removed from this list of regulatory compliance items.	D. 21-11-018
396	Open	Cap on Surcharges - CAW agrees to cap surcharges to 20% of the total bill for the 2021 test year. For the Monterey District, the 20% cap applies but only with adjustments made to exclude water supply related surcharges and for the Hillview District the impact of the existing SRF surcharge. Interim rates would be excluded from the forecast of surcharges and the 20% cap, since interim rates cannot be determined at this time. Additionally, any surcharge recovery above the 20% cap would be deferred for future recovery in rates. This settlement does not preclude CAW from opposing any proposal to include any cap in any other proceeding. Duarte agrees with this resolution.	CAW complied with this through Advice Letter 1353.	D. 21-11-018
397	Ongoing	CAW – San Marino Joint Conservation Program - 1. The Metropolitan Water District of Southern California ("MWD") provides a Member Funded Agency Administered Incentive Program ("MAA") for commercial and residential rebates. The MAA Program is funded by MWD and administered by respective member agencies, and retail agencies. Incentives are based on contract terms between MWD, member agencies, retail agencies, or up to the project cost whichever is lesser.2. Through MWD's MAA Program, San Marino, for fiscal year 2020/21 and fiscal year 2021/22, has a total allocation of \$22,000 (2 year budget at once) to be used for both commercial and residential device-based projects, customized with documented water savings projects, customized with non-documented water savings projects, and customized with non-documented water savings in disadvantaged communities' projects.	CAW has reached out to the City of San Marino multiple times. The City of San Marino has not yet applied for MWD funding; however, in the event that occurs, CAW will comply with this order.	D. 21-11-018
398	Ongoing	CAW – San Marino Joint Conservation Program - 3. CAW shall match dollar-for-dollar any funds that San Marino receives from the MWD MAA Program and assist City staff with the application/reporting of the program(s) to MWD. The MAA Program allows flexibility for San Marino and CAW to implement projects specific to the service area and explore innovative water-savings projects.	CAW has reached out to the City of San Marino multiple times. The City of San Marino has not yet applied for MWD funding; however, in the event that occurs, CAW will comply with this order.	D. 21-11-018
399	Completed	CAW – San Marino Joint Conservation Program - 4. CAW shall implement, in conjunction with the San Marino, a multi-pronged conservation community outreach program to the residents of San Marino including one, all or some combination of the following: auto dial phone call, customer e-mail and/or customer letter, press release, social media posts, informational door-hangers, city and CAW employee talking points and website postings. Outreach messaging would educate and inform the residents of San Marino/CAW's customers on the numerous programs and classes (webinars) they are eligible to take advantage of; how they can lower their indoor and outdoor water use and how they can lower their monthly water bill.	A conservation outreach campaign took place in 2021 that included all customers in San Marino.	D. 21-11-018
400	Completed	CAW – San Marino Joint Conservation Program - 5. CAW and San Marino will meet prior to the filing of CAW's 2022 GRC (i.e., for years 2024, 2025, and 2026) to discuss proposed new projects or infrastructure improvements that would benefit the San Marino water system based on, including but not limited to CAW's Comprehensive Planning Study for Los Angeles.	CAW met with the City of San Marino via Teams on Wednesday March 30th 2022 at 10 am to discuss infrastructure improvements.	D. 21-11-018
401	Completed	3.2. Wastewater Cost Allocation - the Parties to this Settlement have agreed in this proceeding to the following •Reduce General Office and Service Company allocated costs to 50% of the level previously established. Upon a high-level review, it appears that many administrative and service functions are not nearly as related to wastewater service as they are to water service. These include call center operations, laboratory services and legal services;	Rates were set for Monterey WW customers based on approved cost allocation and approved per advice letter 1353.	D. 21-11-018
402	Completed	3.3. Low Income Discount - LPWC and CAW agree that the low-income discount for Monterey active wastewater customers should be increased from the existing 20% to 35% of the monthly bill and support providing a letter and application to all active and passive wastewater customers regarding CAW's CAP.	CAW complied with this through AL 68-S and AL 69-S.	D. 21-11-018

Item	Status	Compliance Order	Comments	Decision/ Resolution
403	Ongoing	3.4. Future Capital Needs/Regulatory Compliance - LPWC and CAW agree that a revision to the Monterey Wastewater cost allocation mitigates the high cost issue in this GRC but acknowledge the need to work collaboratively in the next GRC to address the Central Coast Regional Water Board's ("Regional Water Board") proposed application of the Water Discharge Requirements ("WDR") into a general permit. This action would result in significant future capital improvements for existing wastewater facilities to meet these discharge requirements.	We are investigating a regional solution to the wastewater challenges for Las Palmas, Spreckels, and Indian Springs. Once we determine the alternative(s) solutions, the Company will engage with LPWC to discuss. We expect any solution will require a separate application filing with the CPUC.	D. 21-11-018
404	Ongoing	3.4. Future Capital Needs/Regulatory Compliance - CAW intends to request funding in the next GRC for an engineering study to review the different options once additional information is known from the Regional Water Board.	We are investigating a regional solution to the wastewater challenges for Las Palmas, Spreckels, and Indian Springs. Once we determine the alternative(s) solutions, the Company will engage with LPWC to discuss. We expect any solution will require a separate application filing with the CPUC. We will include dollars in this GRC for engineering studies.	D. 21-11-018
405	Ongoing	3.4. Future Capital Needs/Regulatory Compliance - CAW also agrees to semi-annual meetings with LPWC to address future concerns regarding the Las Palmas wastewater collection system.	WW Supervisor met several times with Las Palmas property manager after GRC settlement to resolve odor concerns. This was largely resolved through cleaning of pond and sludge removal. Supervisor has reached out again to property manager to see if continuation of discussion would be of interest.	D. 21-11-018
406	Completed	Special Request #4 Leak Adjustment Policy and Recovery and Leak Adjustments - Parties agree that leak adjustment costs for the Monterey District should be included in base rates at an amount of \$2.70 million for the test year, if the rate design and AMI requests in this proceeding are adopted, or \$3.25 million for the test year3 if the rate design and AMI are rejected. Lastly, Parties agree that if the actual leak adjustment costs for the Monterey Main system, in any given year during this rate case period (2021-2023), are less than the amount authorized in base rates, this difference will be tracked and returned to customers through the Consolidated Expense Balancing Account ("CEBA"). CAW agrees to file a Tier 1 advice letter in the subsequent year, after the financial close, to adjust the CEBA balance to return these amounts to customers. Thus, parties agree that the LABA should be closed.	CAW complied with this through AL 1353.	D. 21-11-018
407	Ongoing	3.2. Special Request #5 Modification of Existing 15% Cap on WRAM Amortization - Parties agree CAW should keep the current 2016 WRAM surcharge in place until such time that the Pre-2015 meter surcharge is fully recovered, which is anticipated to occur on or before February 28, 2022, per the amortization scheduled approved in D.16-12-003. Once the Pre-2015 meter charge is collected, Parties agree that a new volumetric surcharge be established based on the 15% cap to recover all cumulative under-collected balances. The forecast provided in Attachment A demonstrates that the 15% cap is necessary to collect all cumulative under-collected balances by the end of the GRC term on December 31, 2023. It also demonstrates that establishment of the new volumetric surcharge will result in a rate decrease over the existing Pre-2015 WRAM/MCBA meter charge and 2016 volumetric charge based on forecast assumptions.4 Parties agree that this balances the needs for accelerated recovery while mitigating the rate impact to Monterey District customers.	CAW complied in part through AL 1353 and will comply with the other components through its 2021 WRAM/MCBA filings.	D. 21-11-018
408	Completed	3.3. Special Request #12 Annual Consumption Adjustment Mechanism - Parties agree the ACAM pilot in Monterey should be made permanent. Parties also agree that the ACAM, which uses more recent actual consumption by tier for residential and by division for non-residential, has been an effective tool at helping minimize under-collected WRAM/MCBA balances in our Monterey District. Further, Parties agree that implementation of new GRC rates for the Monterey District should incorporate the actual consumption approved in the 2021 ACAM advice letter for rates effective January 1, 2021, which will reflect the actual consumption for the 12-months ended September 30, 2020. Consumption from the approved 2021 ACAM should be used to establish the final tariff rates as part of the GRC implementation advice letter.	CAW complied with this through Advice Letter 1353.	D. 21-11-018
409	Completed	3.4. Special Request #13 Consolidating Conservation Program Statewide, and Conservation Budget - 1) The conservation budget be set at \$901,8645 for Monterey County District; 2) CAW withdraws SR #13, which sought to consolidate its conservation program into a statewide funded program and surcharge. Recovery of conservation costs should be through base rates and the Conservation Surcharge Balancing Account closed; 3) Authorize that the budgeted conservation costs be spent for Monterey District customers only; 4) Authorize flexibility to shift Monterey conservation funds between rate case cycle years (2021-2023); 5) Authorize flexibility to shift Monterey funds between Best Management Practices categories; and 6) Permit CAW to accrue and defer costs in each year within the GRC period to match the annualized spend authorized by a decision.	CAW is in compliance with this order.	D. 21-11-038

Item	Status	Compliance Order	Comments	Decision/ Resolution
410	Completed	3.5. Special Request #14 – Elimination of Duplicative or Unnecessary Reporting - MPWMD and CAW agree the rebate and audit reports required by D.09-05-029 should be eliminated. CAW's request to eliminate the customer complaint reports remains disputed between CAW and MPWMD.	Duplicative reporting was eliminated in CAW's 2021 Monterey Joint Conservation Report. CAW acknowledges that MPWMD is in dispute of Special Request #14 from A.19-07-004.	D. 21-11-018
411	Completed	3.8. Monterey Sales Forecast - Lastly, Parties agree that the 2019 residential consumption by tier and non-residential consumption by division should be used to establish tariff rates in the final decision. As noted in the Resolution of Section 3.3 above, the GRC implementation advice letter and tariff rates shall reflect consumption from the approved 2021 ACAM advice letter.	CAW complied with this through Advice Letter 1353.	D. 21-11-018
412	Completed	3.8. Monterey Sales Forecast - As noted in the Resolution of Section 3.3 above, the GRC implementation advice letter and tariff rates shall reflect consumption from the approved 2021 ACAM advice letter.	CAW complied with this through Advice Letter 1353.	D. 21-11-018
413	Ongoing	3.11. Tariff Sheet Modifications - MPWMD and CAW agree as follows: 1. CAW will modify its bill presentation so that the MPWMD User Fee appears as the unrounded correct fee of 8.325% or 0.08325.	CAW has complied with this order.	D. 21-11-018
414	Ongoing	3.11. Tariff Sheet Modifications - MPWMD and CAW agree as follows 3. Regarding Special Conditions, General Items, s.c.i., CAW does not object to changing "Carmel Area Wastewater District Entitlement" (the language used in D.11-03-048) to read "The Pebble Beach Company, Hester Hyde Griffin Trust, and J. Lohr Properties Inc. Water Entitlements" at all four locations in the Tariff Sheets.	CAW will file an advice letter reflecting this tariff change prior to the July 1 2022 GRC filing.	D. 21-11-018
415	Completed	3.11. Tariff Sheet Modifications - MPWMD and CAW agree as follows 4. CAW will not remove the MPWSP Special Facilities Fee at \$24,000 per acre foot reflected in Operating Rule 15.	CAW complied with this through AL 1353.	D. 21-11-018
416	Ongoing	Ordering Paragraph 1. Center for Accessible Technology shall be awarded \$52,277.27. Ordering Paragraph 2. Within 30 days of the effective date of this decision, the California Water Service Company shall pay Center for Accessible Technology the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 16, 2021, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made. Ordering Paragraph 3. California Water Service Company shall invoice the other Class A water companies for their respective shares of the award, based on their California-jurisdictional 2019 jurisdictional water revenues for the 2019 calendar year within 30 days of the effective date of this decision. Within 15 days of invoice, California-American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos), Liberty Utilities (Park Water), San Gabriel Valley Water Company, San Jose Water Company, and Suburban Water Systems shall pay California Water Service Company their respective shares of the award, based on their California-jurisdictional 2019 jurisdictional water revenues for the 2019 calendar year, to reflect the year in which the proceeding was primarily litigated.	CAW intends to comply with this order upon being invoiced by Cal Water.	D. 22-02-024
416	Ongoing	Ordering Paragraph 1. Pacific Institute for Studies in Development, Environment, and Security shall be awarded \$19,420.00. Ordering Paragraph 2. Within 30 days of the effective date of this decision, the California Water Service Company shall pay Pacific Institute for Studies in Development, Environment, and Security the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 6, 2021, the 75th day after the filing of Pacific Institute for Studies in Development, Environment, and Security's request, and continuing until full payment is made. Ordering Paragraph 3. California Water Service Company shall invoice the other Class A water companies for their respective shares of the award, based on their California-jurisdictional 2018 jurisdictional water revenues for the 2018 calendar year within 30 days of the effective date of this decision. Within 15 days of invoice, California-American Water Company, Golden State Water Company, Great Oaks Water Company, Liberty Utilities (Apple Valley Ranchos), Liberty Utilities (Park Water), San Gabriel Valley Water Company, San Jose Water Company, and Suburban Water Systems shall pay California Water Service Company their respective shares of the award, based on their California-jurisdictional 2018 jurisdictional water revenues for the 2018 calendar year, to reflect the year in which the proceeding was primarily litigated.	CAW intends to comply with this order upon being invoiced by Cal Water.	D. 22-03-022

Item	Status	Compliance Order	Comments	Decision/ Resolution
417	Ongoing	(b) Each urban water supplier shall submit to the Department of Water Resources a preliminary annual water supply and demand assessment consistent with section 10632.1 of the Water Code no later than June 1 2022 or the effective date of this section whichever comes later, and submit a final annual water supply and demand assessment to the Department of Water Resources no later than the deadline set by section 10632.1 of the Water Code.	CAW submitted its preliminary annual water supply and demand assessment on 6/1/22. The final version will be filed by the deadline set by section 10632.1 of the Water Code.	SWRCB Res. 2022-0606-03E
418	Ongoing	(c) (1) Each urban water supplier that has submitted a water shortage contingency plan to the Department of Water Resources shall implement by June 10, 2022, at a minimum, all demand reduction actions identified in the supplier's water shortage contingency plan adopted under Water Code 10632 for a shortage level of ten (10) to twenty (20) percent (Level 2). (2) Notwithstanding subdivision (c)(1), urban water suppliers shall not be required to implement new residential connection moratoria pursuant to this section. (3) Notwithstanding subdivision (c)(1), an urban water supplier may implement the actions identified in subdivision (d) in lieu of implementing the demand reduction actions identified in the supplier's water shortage contingency plan adopted under Water Code section 10632 for a shortage level of ten (10) to twenty (20) percent (Level 2), provided the supplier meets all of the following (i) The supplier's annual water supply and demand assessment submitted to the Department of Water Resources demonstrates an ability to maintain reliable supply until September 30, 2023. (ii) The supplier does not rely on, for any part of its supply, the Colorado River, State Water Project, or Central Valley Project, and no more than ten (10) percent of its supply comes from critically overdrafted groundwater basins as designated by the Department of Water Resources. (iii) The supplier's average number of gallons of water used per person per day by residential customers for the year 2020 is below 55 gallons, as reported to the Board in the Electronic Annual Report.	CAW has received approval or is waiting approval for ALs 1376, 1371, 1370, 1369, 1354, 1355 that have been filed to move all remaining service areas into Stage 2 of their respective Water Shortage Contingency Plans.	SWRCB Res. 2022-0606-03E
419	Completed	(d) Each urban water supplier that has not submitted a water shortage contingency plan to the Department of Water Resources shall, by June 10, 2022, and continuing until the supplier has implemented all demand reduction actions identified in the supplier's water shortage contingency plan adopted under Water Code 10632 for a shortage level of ten (10) to twenty (20) percent (Level 2), implement at a minimum the following actions (1) Initiate a public information and outreach campaign for water conservation and promptly and effectively reach the supplier's customers, using efforts such as email, paper mail, bill inserts, customer app notifications, news articles, websites, community events, radio and television, billboards, and social media. (2) Implement and enforce a rule or ordinance limiting landscape irrigation with potable water to no more than two (2) days per week and prohibiting landscape irrigation with potable water between the hours of 1000 a.m. and 600 p.m. (3) Implement and enforce a rule or ordinance banning, at a minimum, the water uses prohibited by section 995. Adoption of a rule or ordinance is not required if the supplier has authority to enforce, as infractions, the prohibitions in section 995 and takes enforcement against violations.	CAW has submitted a water shortage contingency plan to DWR.	SWRCB Res. 2022-0606-03E
420	Ongoing	(e) (1) To prevent the unreasonable use of water and to promote water conservation, the use of potable water is prohibited for the irrigation of non-functional turf at commercial, industrial, and institutional sites. (2) Notwithstanding subdivision (e)(1), the use of water is not prohibited by this section to the extent necessary to ensure the health of trees and other perennial non-turf plantings or to the extent necessary to address an immediate health and safety need. (3) Notwithstanding subdivision (e)(1), an urban water supplier may approve a request for continued irrigation of non-functional turf where the user certifies that the turf is a low water use plant with a plant factor of 0.3 or less, and demonstrates the actual use is less than 40% of reference evapotranspiration. (f) The taking of any action prohibited in subdivision (e) is an infraction punishable by a fine of up to five hundred dollars (\$500) for each day in which the violation occurs. The fine for the infraction is in addition to, and does not supersede or limit, any other remedies, civil or criminal.	CAW is in the process of implementing the CII non-functional turf irrigation ban and has sent out notifications to all of its CII customers regarding this ban.	SWRCB Res. 2022-0606-03E

ATTACHMENT 2

California American Water Company
Bellflower Municipal Water System Acquisition

Revenue Requirement Assuming Consolidation
(\$ in Thousands)

Attachment 1
Testimony of J. Morse

	Bellflower MWS 2016-2017 CAFR*	Bellflower Standalone Without Increase (2018)	Bellflower Standalone Making Authorized ROR (2018)	Bellflower Revenue Supported Rate Base	Revenue Requirement of Transferred Rate Base to Corporate***	CAW 2018 Summary of Earnings **	Combined (2018)
OPERATING REVENUES							
Total Operating Revenue	1,835	\$ 1,835	\$ 2,936	\$ 1,835	\$ 1,101	224,131	227,067
OPERATING EXPENSES							
Salaries	39	-	-	-	0	21,407	21,407
Benefits	31	-	-	-	0	5,580	5,580
Adminstration	250	-	-	-	0	9,202	9,202
Distribution lines	92	-	-	-	0	-	-
Energy	121	101	101	101	0	6,928	7,029
Insurances	-	19	19	19	0	2,536	2,555
Licenses	11	-	-	-	0	-	-
Maintenance	39	39	39	39	0	6,310	6,349
Reclaimed water	6	-	-	-	0	-	-
Professional services	19	-	-	-	0	-	-
Customer Accounting		21	21	21	0	1,674	1,695
Pumps and wells	72	-	-	-	0	-	-
Contracted services	21	16	16	16	0		16
Regulatory Expense						1,061	1,061
Rents						1,807	1,807
Shared Business Services		102	102	102	0	11,226	11,328
Citizens Acquisition Premium			-			4,201	4,201
General Office Return on Rate Base			-		0	2,324	2,324
Amortization	7	-	-	-	0	1,332	1,332
Tools and equipment	27	-	-	-	0	-	-
Treatment and test	47	31	31	31	0	999	1,030
Operations			-		0	4,244	4,244
Uncollectibles				-	0	3,597	3,597
Water purchases	183	173	173	173	0	53,782	53,955
San Clemente Dam				-	0	7,921	7,921
Other expense	6	70	70	70	0		70
Taxes	3	144	144	77	67	6,914	7,058
Depreciation	179	425	425	227	198	23,520	23,945
Total Operating Expenses & Other Deductions	1,190	1,140	1,140	876	265	176,565	177,705
Operating Income (Loss) Before Income Taxes	646	695	1,796	960	836	47,566	49,362
Income Taxes	-	194	503	269	234	9,659	10,162
Net Income	646	500	1,293	691	602	37,907	39,200
Rate Base	NA	17,000	17,000	9,085	7,915	498,135	515,135
Rate of Return	NA	2.94%	7.61%	7.61%	7.61%	7.61%	7.61%
% Revenue Increase:		0.00%	59.99%				1.31%

*These figures reflect a 3% inflation increase to the numbers in the CAFR fiscal year ending June 30, 2017.

**Per D.18-12-021 in A16-07-002

*** While shown herein as line item expenses - these line item expenses will be shown as General Office Return on Rate Base for ratemaking purposes

**California American Water Company
East Pasadena Water Company Acquisition**

**Revenue Requirement Assuming Consolidation
(\$ in Thousands)**

**Attachment 1
Testimony of S. Owens**

	East Pasadena Forecast	East Pasadena Standalone Post- Acquisition Without Increase/Decrease in Rates**	East Pasadena Standalone Post- Acquisition Earning Authorized ROR	East Pasadena Revenue Supported Rate Base	Revenue Requirement of Rate Base Transferred to Corporate	CAW Forecasted (per GRC A.19- 07-002)	Combined
	Year 2021* (1)	Year 2021* (2)	Year 2021* (3)	Year 2021* (4)	Year 2021* (5)	Year 2021* (6)	Year 2021* (7) = (3) + (6)
Operating Revenues							
Total Revenue	3,420.7	3,420.7	5,365.7	3,420.7	1,945.0	272,624.2	277,990
Operation & Maintenance Exp							
Total O&M expenses	2,759.9	1,322.2	1,322.2	1,322.2	-	169,431.8	170,754
Depreciation	350.9	204.9	204.9	106.2	98.8	31,737.0	31,942
General Taxes	118.6	264.3	264.3	141.4	122.9	8,879.7	9,144
Total Operating Expenses	3,229.4	1,791.5	1,791.5	1,569.7	221.7	210,048.5	211,840
Income Before Income Taxes	191.3	1,629.2	3,574.2	1,851.0	1,723.3	62,575.8	66,150
Total Income Taxes	52.9	450.3	987.8	511.5	476.2	10,072.7	11,060
TOTAL EXPENSES	3,282.3	2,241.7	2,779.2	2,081.3	698.0	220,121.1	222,900
Utility Operating Income	138.4	1,179.0	2,586.5	1,339.4	1,247.0	52,503.1	55,090
Average Rate Base	4,084.4	34,000.0	34,000.0	17,610.0	16,390.0	689,918.6	723,919
Return on Rate Base	3.39%	3.47%	7.61%	7.61%	7.61%	7.61%	7.61%
% Revenue Increase Attributed to East Pasadena Customers:							1.25%
% Revenue Increase Attributed to CAW customers:							0.71%
Total % Revenue Increase:							1.97%

*Assumes acquisition closes in 2021 per CPUC approved processing schedule approved in D.99-10-064 and estimated 30 to 90 days post-Decision to close (see Testimony of Stephen Wesley Owens)

**Modeling assumes synergies incorporated in Y1 (see Testimony of Stephen Wesley Owens)

California American Water Company
Warring Water Company Acquisition

Revenue Requirement Assuming Consolidation
(\$ in Thousands)

Attachment 1
Testimony of S. Owens

	Warring Forecast	Warring Standalone Post-Acquisition Without Increase/Decrease in Rates**	Warring Standalone Post-Acquisition Earning Authorized ROR	Warring Revenue Supported Rate Base	Revenue Requirement of Rate Base Transferred to Corporate	CAW Forecasted (per GRC A.19-07-002)	Combined
	Year 2021*	Year 2021*	Year 2021*	Year 2021*	Year 2021*	Year 2021*	Year 2021*
	(1)	(2)	(3)	(4)	(5)	(6)	(7) = (3) + (6)
Operating Revenues							
Total Revenue	644.1	644.1	966.2	644.1	322.1	272,624.2	273,590
Operation & Maintenance Exp							
Total O&M expenses	493.3	319.0	319.0	319.0	-	169,431.8	169,751
Depreciation	86.4	115.0	115.0	56.4	58.6	31,737.0	31,852
General Taxes	36.0	48.4	48.4	31.4	17.0	8,879.7	8,928
Total Operating Expenses	615.6	482.4	482.4	406.8	75.6	210,048.5	210,531
Income Before Income Taxes	28.5	161.7	483.7	237.3	246.4	62,575.8	63,060
Total Income Taxes	7.9	44.7	133.7	65.6	68.1	10,072.7	10,206
TOTAL EXPENSES	623.5	527.1	616.1	472.4	143.7	220,121.1	220,737
Utility Operating Income	20.6	117.0	350.1	171.7	178.3	52,503.1	52,853
Average Rate Base	1,384.4	4,600.0	4,600.0	2,255.4	2,344.6	689,918.6	694,519
Return on Rate Base	1.49%	2.54%	7.61%	7.61%	7.61%	7.61%	7.61%
% Revenue Increase Attributed to Warring Customers:							0.24%
% Revenue Increase Attributed to CAW Customers:							0.12%
Total % Revenue Increase:							0.35%

*Assumes acquisition closes in 2021 per CPUC approved processing schedule approved in D.99-10-064 and estimated 30 to 90 days post-Decision to close (see Testimony of Stephen Wesley Owens)

**Modeling assumes synergies incorporated in Y1 (see Testimony of Stephen Wesley Owens)

**California American Water Company
Bass Lake Water Company Acquisition**

**Revenue Requirement Assuming Consolidation
(\$ in Thousands)**

**Attachment 1
Testimony of S.W. Owens**

	Bass Lake Forecast	Bass Lake Standalone Post-Acquisition Without Increase/Decrease in Rates	Bass Lake Standalone Post- Acquisition Earning Authorized ROR	Bass Lake Revenue Supported Rate Base	Revenue Requirement of Rate Base Transferred to Corporate	CAW Forecasted (per D.21-11- 018 and A.21- 05-001)	Combined
	Year 2022 (1)	Year 2022 (2)	Year 2022 (3)	Year 2022 (4)	Year 2022 (5)	Year 2022 (6)	Year 2022 (7) = (3) + (6)
Operating Revenues							
Total Revenue	1,146.3	1,146.3	1,351.6	1,146.3	205.3	280,125.2	281,477
Operation & Maintenance Exp							
Total O&M expenses	687.5	517.9	517.9	517.9	-	172,284.2	172,802
Depreciation	102.2	137.3	137.3	111.2	26.2	33,809.0	33,946
General Taxes	61.3	73.5	73.5	49.6	24.0	9,235.5	9,309
Total Operating Expenses	850.9	728.7	728.7	678.6	50.1	215,328.6	216,057
Income Before Income Taxes	295.4	417.6	622.9	467.7	155.2	64,796.6	65,419
Total Income Taxes	81.6	115.4	172.1	129.2	42.9	10,507.5	10,680
TOTAL EXPENSES	932.6	844.1	900.9	807.9	93.0	225,836.1	226,737
Utility Operating Income	213.7	302.2	450.8	338.4	112.3	54,289.1	54,740
Average Rate Base	3,067.0	5,923.3	5,923.3	4,446.5	1,476.8	713,391.3	719,315
Return on Rate Base	6.97%	5.10%	7.61%	7.61%	7.61%	7.61%	7.61%
% Revenue Increase Attributed to Bass Lake Customers:							0.41%
% Revenue Increase Attributed to CAW customers:							0.07%
Total % Revenue Increase:							0.48%

Notes:

Assumes acquisition closes in 2022 per CPUC approved processing schedule approved in D.99-10-064 and estimated 30 to 90 days post-Decision to close

Modeling assumes synergies incorporated in Y1 (see Testimony of Stephen Wesley Owens)

Forecasts assume authorized escalation year 2022 summary of earnings (per D.21-11-018) with proposed cost of capital (pending Application 21-05-001)

ATTACHMENT 3

Coding Labor and Expenses for California Support to Hawaii



California American Water employees routinely support our operations in Hawaii with management and administrative support, engineering services, and more. It is important that every employee accurately codes their time spent supporting Hawaii American Water to ensure that costs are appropriated fairly.

 Procedures

 Knowledge Check

Procedures

For Hawaii capital projects, California employees directly working on the project charge the project-specific internal order number. Hawaii employees directly working on the project directly charge the project's WBS. This allows overheads to be charged appropriately.

Please contact Mark Hernandez, Capital Administrator, for assistance with the project-specific internal order numbers.

[Click each section below](#) to discover how to properly code your time and expenses for supporting Hawaii.

Non Capital Support (O&M) —

Non-Capital Support are the costs necessary to carry, operate, and maintain the functionality and appearance of an asset over its service life after its installation.

California employees should use internal order **#70000127** in myTime when providing non-capital (O&M) support to Hawaii.

Indirect Overhead —

Indirect Overhead are costs that consist primarily of supervisory or engineering payroll and applicable payroll related costs, and certain other limited costs that directly support construction activities.

California employees should use internal order #70000126 in myTime for non-project specific capital work (indirect overhead).

Direct Labor —

Direct Labor includes labor costs of employees who work directly on a capital project such as a foreman. Support staff such as administration is categorized as indirect labor as they are not actively involved on the capital project and their labor costs are expensed instead of capitalized.

Hawaii capital Investment Projects get Internal Orders as well as other capital projects as needed to ensure correct tracking of charges.

Knowledge Check

Question

01/04

True or False:

California American Water provides engineering and management support to Hawaii.

☐

True

☐

False

Question

02/04

True or False:

California employees should charge their time to the correct internal order number when supporting Hawaii operations.

☐

True

☐

False

Question

03/04

True or False:

Each Hawaii capital Investment Project has a corresponding internal order to be set up in California to ensure the correct tracking of changes.

☐

True

☐

False

Question

04/04

Which internal order number do you use when entering your time in myTime for supporting Hawaii with Non-Capital Support?

- ☐ 71270000
- ☐ 70000127
- ☐ Your standard WBS code.

ATTACHMENT 4

California American Water
Employee Hours Billed to Hawaii

Job Title	2019 Hours			2020 Hours			2021 Hours			Three Year Average		
	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total
President Large1 State	71	0	71	51	0	51	59	0	59	60	0	60
Dir Govt Affairs (State)	0	0	0	4	0	4	4	0	4	3	0	3
Operations Specialist	0	0	0	0	0	0	28	0	28	9	0	9
Mgr Ext Affairs (State)	0	0	0	0	0	0	10	0	10	3	0	3
Sr Engineering Project Manager	0	881	881	0	687	687	0	1,099	1,099	0	889	889
CFO, Operations	196	0	196	8	0	8	136	0	136	113	0	113
Mgr Finance	93	0	93	105	0	105	114	0	114	104	0	104
Sr Maint Service Specialist	0	4	4	0	0	0	0	0	0	0	1	1
Dir Health & Safety (State)	80	0	80	0	0	0	0	0	0	27	0	27
Sr. Specialist, Technology Field Service	33	0	33	64	0	64	70	118	188	56	39	95
Specialist, Technology Field Services	0	0	0	0	0	0	2	0	2	1	0	1
VP Managing General Counsel	0	0	0	31	0	31	48	0	48	26	0	26
Dir Corp Counsel	0	0	0	7	0	7	47	0	47	18	0	18
Paralegal IV (N)	0	0	0	0	0	0	111	0	111	37	0	37
Dir Corp Counsel	0	0	0	0	0	0	8	0	8	3	0	3
Dir Corp Counsel	42	0	42	9	0	9	57	0	57	36	0	36
Operations Specialist	0	0	0	0	0	0	36	0	36	12	0	12
Operations Specialist	0	0	0	0	0	0	4	0	4	1	0	1
Project Manager Operations	0	0	0	3	0	3	40	0	40	14	0	14
Manager, Procurement	2	0	2	0	0	0	0	0	0	1	0	1
Sr. Director Rates and Regulatory	44	0	44	47	0	47	43	0	43	45	0	45
Director Rates and Regulatory	0	0	0	5	0	5	76	0	76	27	0	27
Rates & Regulatory Analyst	0	0	0	0	0	0	88	0	88	29	0	29
HR Business Partner	0	0	0	0	0	0	52	0	52	17	0	17
Sr Rates & Regulatory Analyst	0	0	0	0	0	0	305	0	305	102	0	102
Sr Mgr Rates & Regulatory	0	0	0	0	0	0	53	0	53	18	0	18
Rates & Regulatory Analyst	0	0	0	0	0	0	37	0	37	12	0	12
Rates & Regulatory Analyst	0	0	0	0	0	0	254	0	254	85	0	85
Total Hours	560	885	1,445	334	687	1,021	1,681	1,217	2,898	858	930	1,788

ATTACHMENT 5

California American Water
Summary of Specific GO Expenses and Assets Allocated

Description	Test Year 2024
Total Projected Payroll Cost	\$145,943
Total Projected APP Cost	14,531
Total Projected DCP Cost	6,172
Total Projected Retiree Medical Costs	319
Total Projected ESPP Cost	463
Total Projected FICA Cost	9,248
Projected Medicare Cost	2,274
Projected FUTA Cost	61
Projected SUTA Cost	630
Projected 401k Cost	5,205
Projected Group Insurance Cost	24,218
Total Projected Pension Service Cost	6,873
Projected Pension Non-Service Cost to Be Expensed	1,705
General Overhead	29,481
Total	\$247,122

GO General Overhead

Janitorial	\$173
Office & Admin Supplies	564
Security Service	(166)
Voice - Telephone	1,639
Voice - Cell	1,303
Wireless Service	14
Rents-Real Property	12,152
Rents-Equipment	548
M&S Maint	11,135
GO IT Costs - Personal Computing Devices (1)	757
GO Fixed Asset Costs (2)	1,361
	\$29,481

(1) MS Office, Virus Protection and other global APPs

(2) GO Fixed Assets Shown Below:

Account	Description	Gross Book Value
304500	Structures & Improvements - General	\$ 263,898
340100	Office Furniture & Equipment	\$ 291,590
340500	Other Office Equipment	\$ 26,279
346100	Communications Equipment Non-Telephone	\$ -
346200	Communications Equipment Telephone	\$ 92,134
	Total GO Amount	\$ 673,901
		10%
	GO Depreciation	\$ 67,390
	Amount Allocated to Hawaii American Water	\$ 1,361

ATTACHMENT 6

CALIFORNIA-AMERICAN WATER

DEPRECIATION RATE STUDY

AT DECEMBER 31, 2020



<http://www.utilityalliance.com>

CALIFORNIA-AMERICAN WATER
DEPRECIATION RATE STUDY
EXECUTIVE SUMMARY

California-American Water (“CAW” or “Company”) engaged Alliance Consulting Group to conduct a depreciation study of the Company’s water and wastewater operations depreciable assets as of December 31, 2020.

Overall, this study recommends an increase of \$2.0 million in annual depreciation expense when compared to the depreciation rates currently in effect. This study reflects changes to all eight districts in which CAW operates. Where possible, consistent life and net salvage parameters were applied to all districts for similar asset groups.

Appendix A provides the calculation of the recommended depreciation rates. Appendix A-1 provides the calculation of the recommended amortization rates for assets that will adopt FERC Accounting Release AR-15, which allows for the automatic retirement of assets that reach the life of account. Appendix B provides the calculation of the recommended depreciation rates. Appendix C provides the mortality characteristics (life, curve, salvage, and cost of removal) for the accounts and districts analyzed. Appendix D shows the net salvage analysis for water and wastewater operations. Appendix E shows the results of reserve reallocation for each division an account.

CALIFORNIA-AMERICAN WATER

DEPRECIATION RATE STUDY

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PURPOSE

The purpose of this study is to develop depreciation rates for depreciable property as recorded on CAW's books at December 31, 2020. The account-based depreciation rates were designed to recover the total remaining undepreciated investment for the analyzed accounts, adjusted for net salvage, over the remaining life of the property on a straight-line basis.

CAW owns and operates water and wastewater systems in communities across the state of California. The Company operates and maintains water systems that treat water from wells, rivers, lakes, and reservoirs across several districts. In the Monterey District, the Company also provides wastewater systems, designed, and operated with careful attention to the local environment.

STUDY RESULTS

Overall depreciation rates for the specific depreciable property analyzed and included in this study are shown in Appendix A. These rates translate into an annual depreciation accrual of \$34.4 million based on CAW's depreciable investment at December 31, 2020. The annual equivalent depreciation expense calculated by the same method using the approved rates is \$32.4 million. Appendix A presents a comparison of approved rates versus proposed rates by account and district. Appendix B demonstrates the development of the annual depreciation rates and accruals. Appendix C presents a summary of mortality and net salvage estimates by account. Appendix D shows the net salvage history for water and waste water operations. Appendix E shows the results of reserve reallocation for each division an account.

GENERAL DISCUSSION

Definition

The term "depreciation" as used in this study is considered in the accounting sense; that is, a system of accounting that distributes the cost of assets, less net salvage (if any), over the estimated useful life of the assets in a systematic and rational manner. It is a process of allocation, not valuation. This expense is systematically allocated to accounting periods over the life of the properties. The amount allocated to any one accounting period does not necessarily represent the loss or decrease in value that will occur during that particular period. The Company accrues depreciation on the basis of the original cost of all depreciable property included in each functional property group. On retirement the full cost of depreciable property, less the net salvage value, is charged to the depreciation reserve.

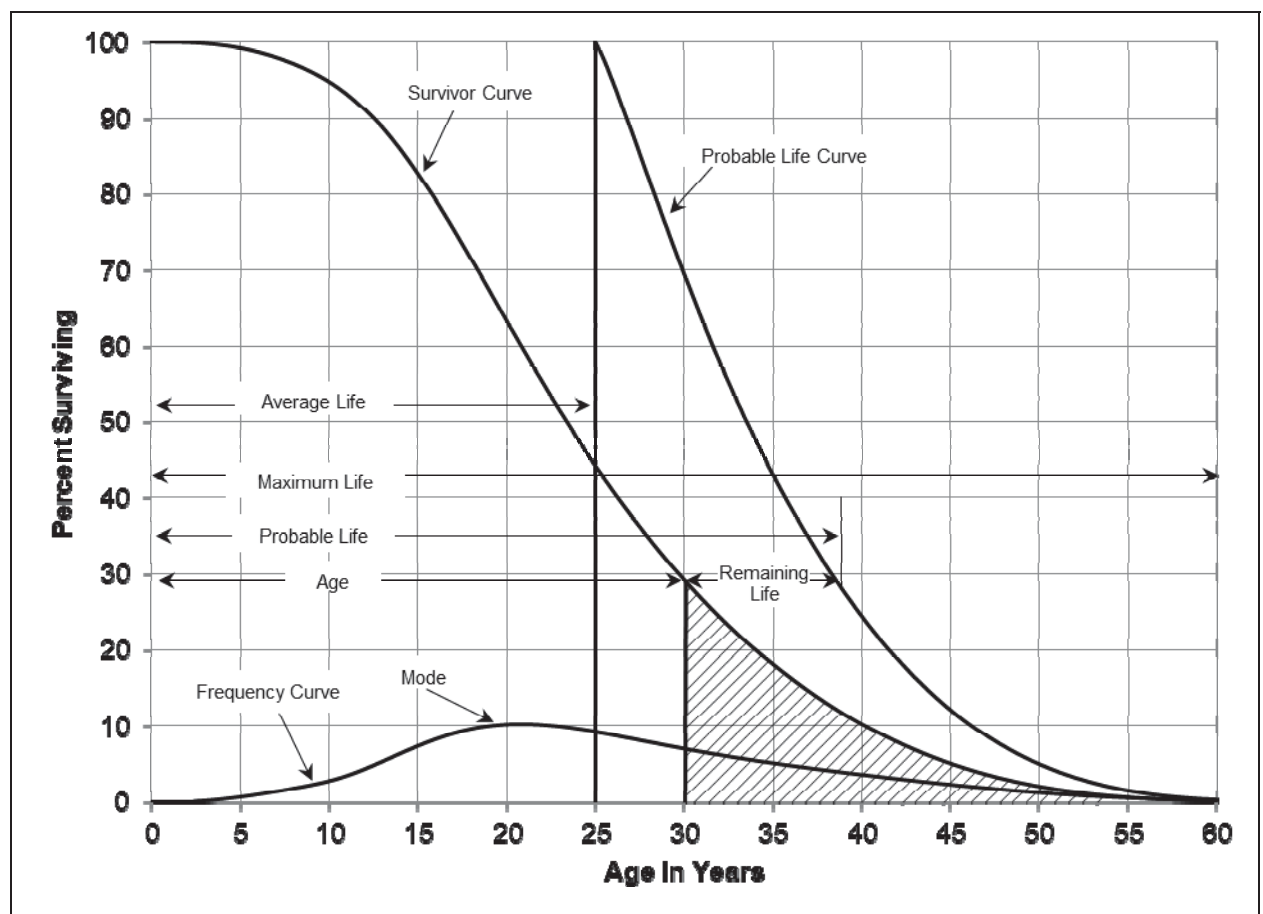
Basis of Depreciation Estimates

The straight-line, broad (average) life group, remaining-life depreciation system was employed to calculate annual and accrued depreciation in this study. In this system, the annual depreciation expense for each group is computed by dividing the original cost of the asset less allocated depreciation reserve less estimated net salvage by its respective average life group remaining life. The resulting annual accrual amounts of all depreciable property within a function were accumulated, and the total was divided by the original cost of all functional depreciable property to determine the depreciation rate. The calculated remaining lives and annual depreciation accrual rates were based on attained ages of plant in service and the estimated service life and salvage characteristics of each depreciable group. The computations of the annual depreciation rates are shown in Appendix A.

Survivor Curves

To fully understand depreciation projections in a regulated utility setting, there must be a basic understanding of survivor curves. Individual property units within a group do not normally have identical lives or investment amounts. The average life of a group can be determined by first constructing a survivor curve which is plotted as a percentage of the units surviving at each age. A survivor curve represents the percentage of property remaining in service at various age intervals. The chart below shows a typical generalized survivor curve as well as some of the life characteristics that can be derived from the survivor curve.

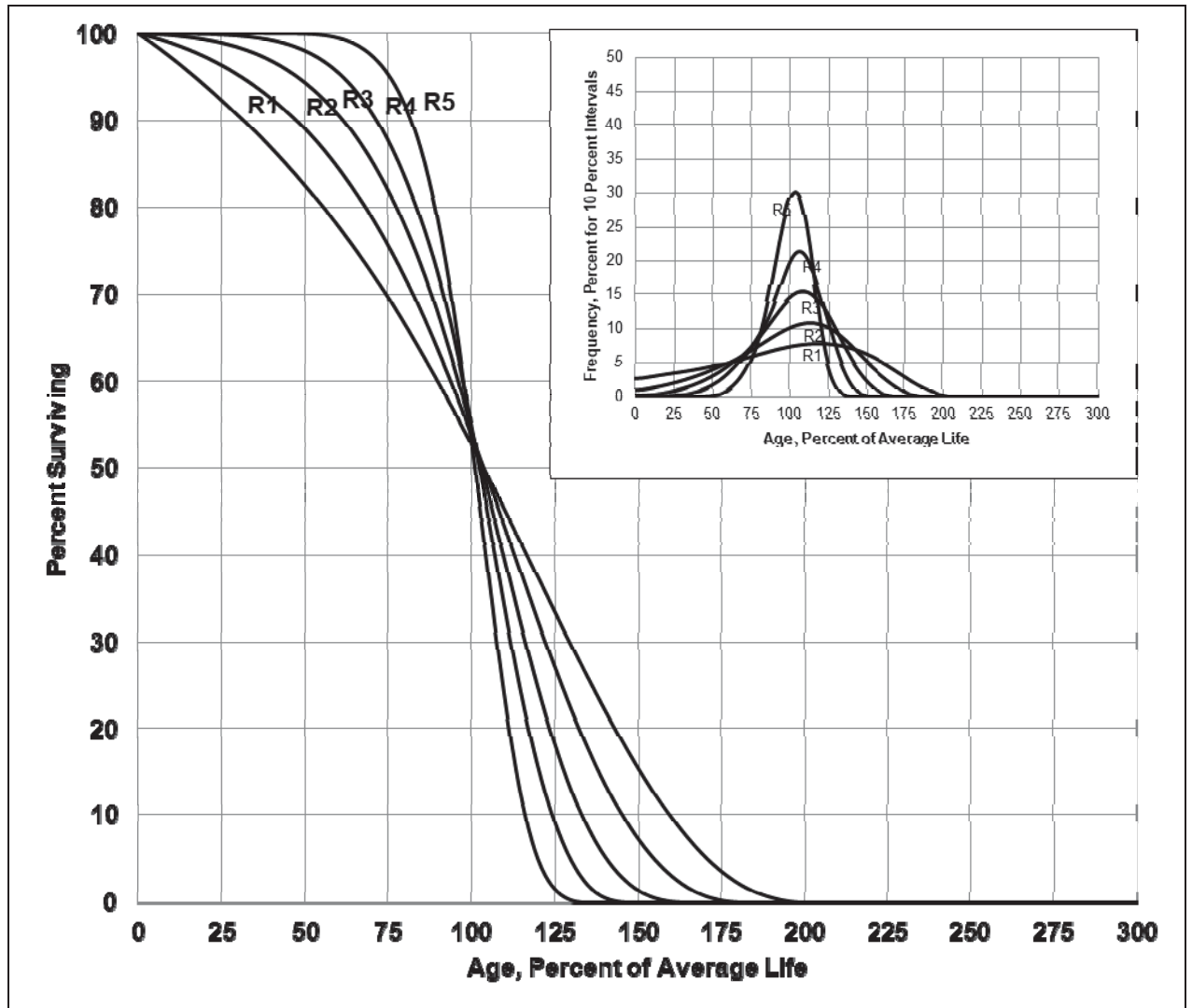
GENERALIZED SURVIVOR CURVE



The Iowa Curves (survivor curves) are the result of an extensive investigation of life characteristics of physical property made at Iowa State College Engineering Experiment Station in the first half of the prior century. Through common usage, revalidation and regulatory acceptance, these curves have become a descriptive standard for the life characteristics of industrial property.

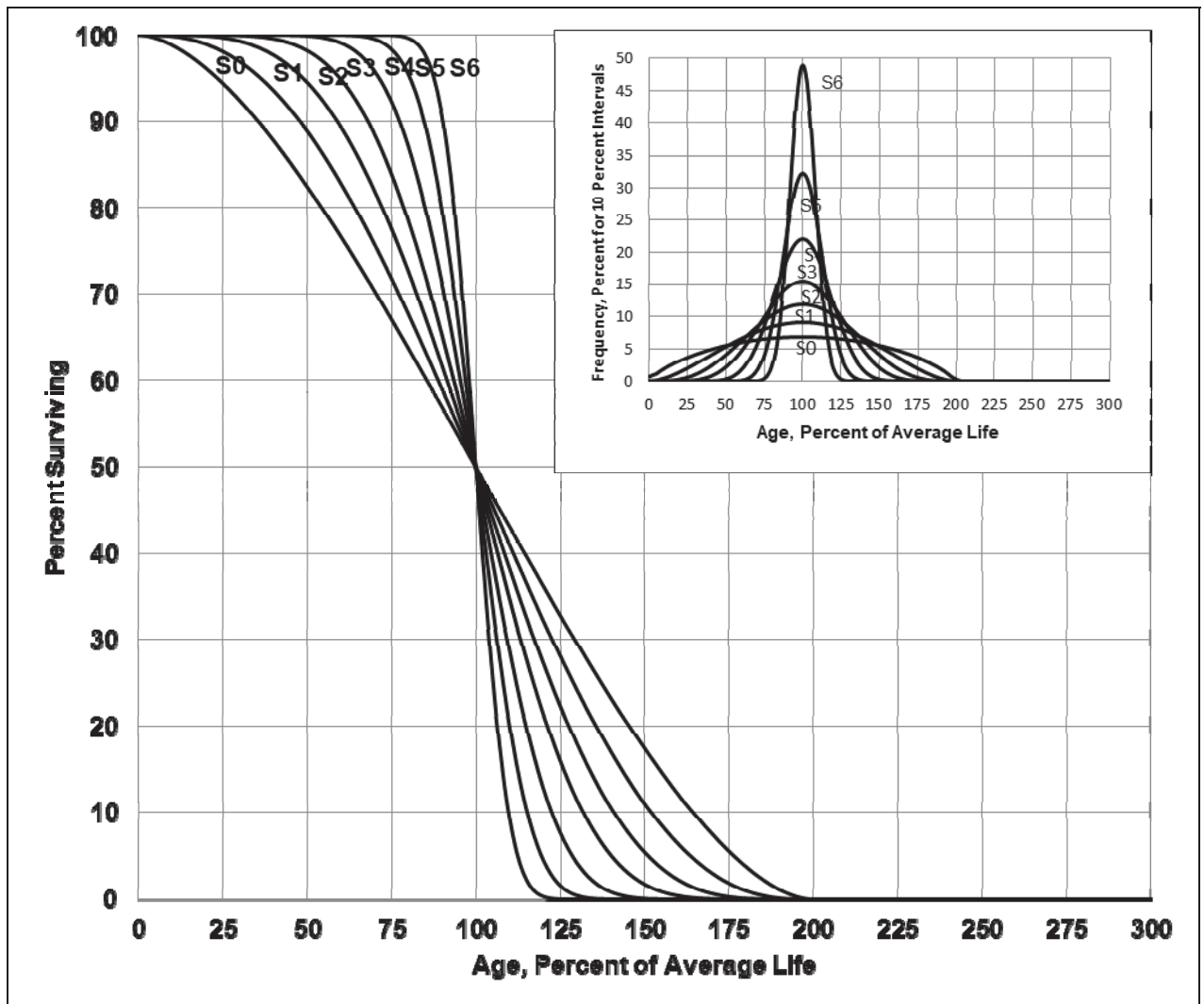
There are four families in the Iowa Curves that are distinguished by the relation of the age at the retirement mode (largest annual retirement frequency) and the average life. For distributions with the mode age greater than the average life, an "R" designation (i.e., Right modal) is used. The family of "R" moded curves is shown below.

R-TYPE IOWA SURVIVOR CURVES



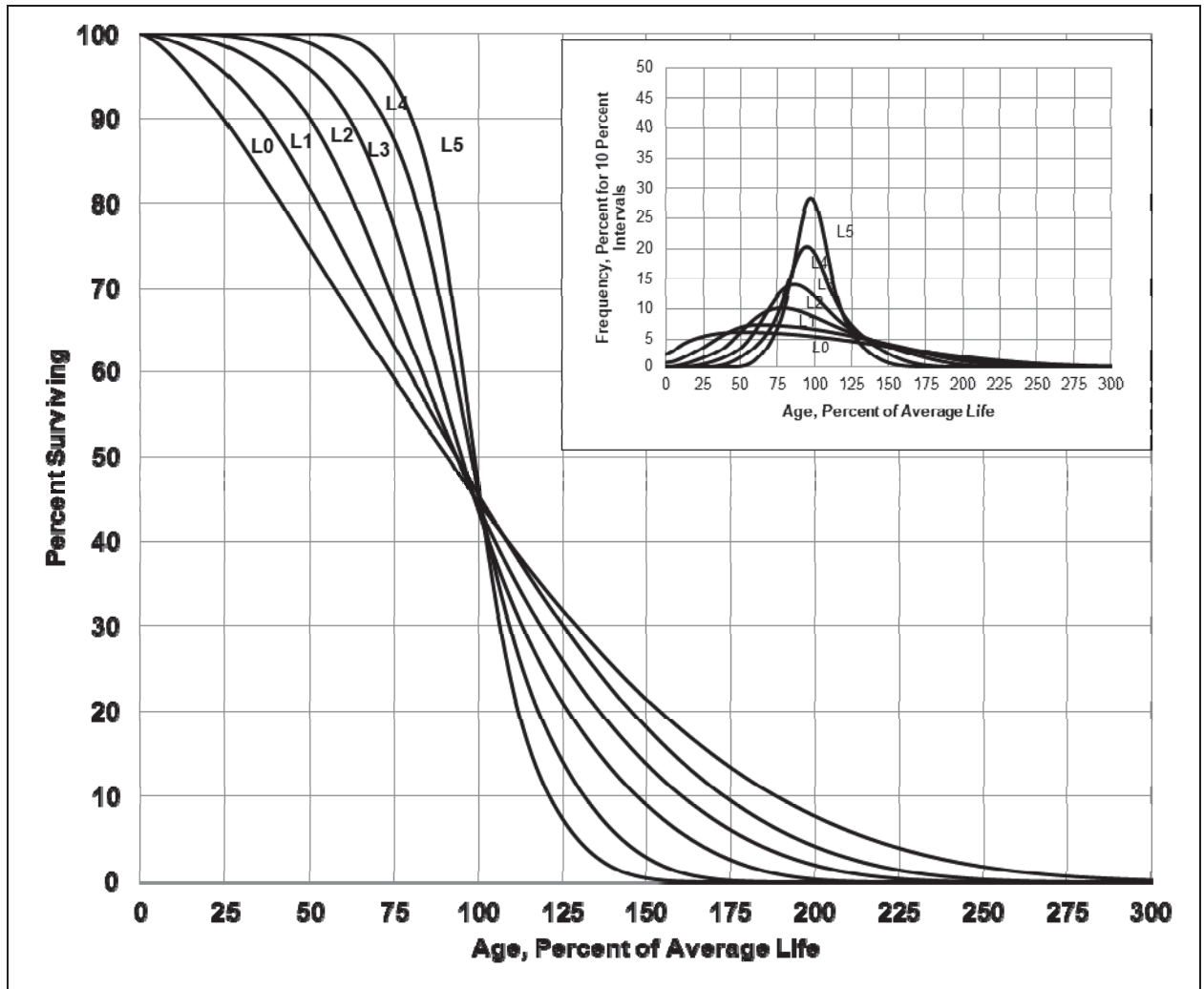
Similarly, an "S" designation (i.e., Symmetric modal) is used for the family whose mode age is symmetric about the average life. The higher the number of the curve, the greater the peak. A graph showing the S curves is shown below.

S-TYPE IOWA SURVIVOR CURVES



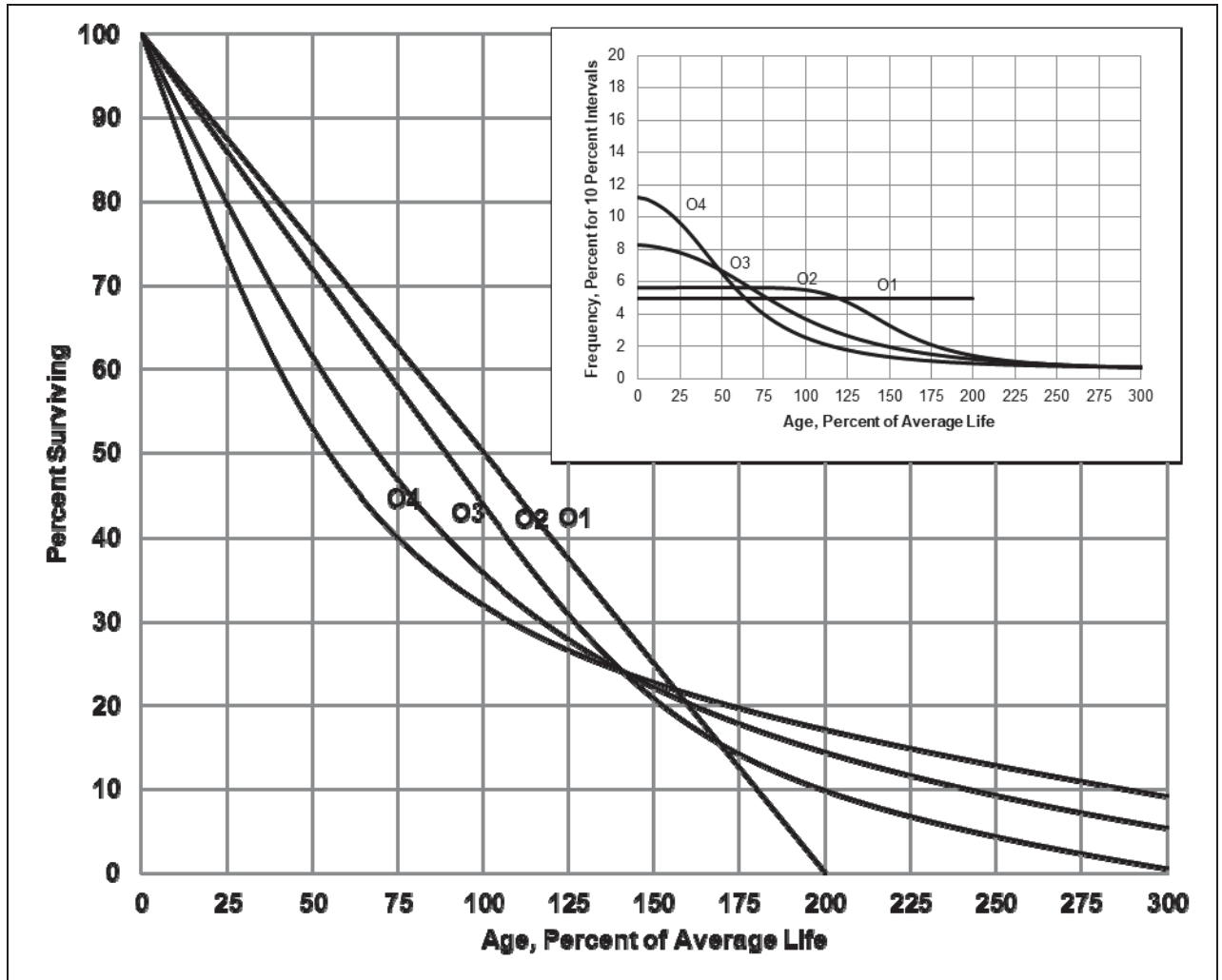
For distributions with the mode age less than the average life, a "L" designation (i.e., Left modal) is used. The family of "L" moded curves is shown below.

L-TYPE IOWA SURVIVOR CURVES



A special case of left modal dispersion is the "O" or origin modal curve family which was developed in the 1950s.

O-TYPE IOWA SURVIVOR CURVES



Given how long the O curves live, the O curves are seldom used in analyzing utility property in Alliance Consulting Group's experience. The O curves have been used for intellectual property.

Within each curve family, numerical designations are used to describe the relative magnitude of the retirement frequencies at the mode. A "6" indicates that the retirements are not greatly dispersed from the mode (i.e., high mode frequency), while a "1" indicates a large dispersion about the mode (i.e., low mode frequency). For example, a curve with an average life of 30 years and an "L3" dispersion is a moderately dispersed, left modal curve that can be designated as a 30 L3 Curve. An SQ, or square, survivor curve occurs where no dispersion is present (i.e., units of common age retire simultaneously).

Most property groups can be closely fitted to one Iowa Curve with a unique average service life. The blending of judgment concerning current conditions and future trends along with the matching of historical data permits the depreciation analyst to make an informed selection of an account's average life and retirement dispersion pattern.

Actuarial Analysis

Actuarial analysis (retirement rate method) was used in evaluating historical asset retirement experience where vintage data were available and sufficient retirement activity was present. In actuarial analysis, interval exposures (total property subject to retirement at the beginning of the age interval, regardless of vintage) and age interval retirements are calculated. The complement of the ratio of interval retirements to interval exposures establishes a survivor ratio. The survivor ratio is the fraction of property surviving to the end of the selected age interval, given that it has survived to the beginning of that age interval. Survivor ratios for all of the available age intervals were chained by successive multiplications to establish a series of survivor factors, collectively known as an observed life table. The observed life table shows the experienced mortality characteristic of the account and may be compared to standard mortality curves such as the Iowa Curves. Where data was available, accounts were analyzed using this method. Placement bands were used to illustrate the composite history over a specific era, and experience bands were used to focus on retirement history for all vintages during a set period. The results from these analyses for those accounts which had data sufficient to be analyzed using this method are shown in the Life Analysis section of this report.

Simulated Plant Record Procedure

The SPR - Balances approach is one of the commonly accepted approaches to analyze mortality characteristics of utility property. SPR was applied to certain composite accounts where there was insufficient historical transactions for actuarial analysis. In this method, an Iowa Curve and average service life are selected as a starting point of the analysis and its survivor factors applied to the actual annual additions to give a sequence of annual balance totals. These simulated balances are compared with the actual balances by using both graphical and statistical analysis. Through multiple comparisons, the mortality characteristics (as defined by an average life and Iowa Curve) that are the best match to the property in the account can be found.

The Conformance Index (CI) is one measure used to evaluate various SPR analyses. CIs are also used to evaluate the "goodness of fit" between the actual data and the Iowa Curve being referenced. The sum of squares difference (SSD) is a summation of the difference between the calculated balances and the actual balances for the band or test year being analyzed. This difference is squared and then summed to arrive at the SSD.

$$SSD = \sum_1^n (Calculated\ Balance_i - Observed\ Balance_i)^2$$

Where n is the number of years in the test band.

This calculation can then be used to develop other calculations, which the analyst feels might give a better indication for the "goodness of fit" for the representative curve under consideration. The residual measure (RM) is the square root of the average squared differences as developed above. The residual measure is calculated as follows:

$$RM = \sqrt{\frac{SSD}{n}}$$

The CI is developed from the residual measure and the average observed plant balances for the band or test year being analyzed. The calculation of conformance index is shown below:

$$CI = \frac{\sum_i^n Balances_i / n}{RM}$$

The retirement experience index (REI) gives an indication of the maturity of the account and is the percent of the property retired from the oldest vintage in the band at the end of the test year. Retirement indices range from 0 percent to 100 percent and an REI of 100 percent indicates that a complete curve was used. A retirement index less than 100 percent indicates that the survivor curve was truncated at that point. The originator of the SPR method, Alex Bauhan, suggests ranges of value for the CI and REI. The relationship for CI proposed by Bauhan is shown below¹:

CI	Value
Over 75	Excellent
50 to 75	Good
25 to 50	Fair
Under 25	Poor

The relationship for REI proposed by Bauhan² is shown below:

REI	Value
Over 75	Excellent
50 to 75	Good
33 to 50	Fair
17 to 33	Poor
Under 17	Valueless

Despite the fact there has not been empirical research to validate Bauhan's conclusions, depreciation analysts have used these measures in analyzing SPR results for nearly 60 years, since the SPR method was developed.

¹ Public Utility Depreciation Practices, p. 96.

² Public Utility Depreciation Practices, p. 97.

Each of these statistics provides the analyst with a different perspective of the comparison between a band of simulated or calculated balances and the observed or actual balances in the account being studied. Although one statistic is not necessarily superior over the others, the conformance index is the one many analysts use in depreciation studies. The depreciation analyst should carefully weigh the data from REIs to ensure that a mature curve is being used to estimate life.

Statistics are useful in analyzing mortality characteristics of accounts as well as determining a range of service lives to be analyzed using the detailed graphical method. However, these statistics boil all the information down to one, or at most, a few numbers for comparison. Visual matching through comparison between actual and calculated balances expands the analysis by permitting the analyst to view many points of data at a time. The goodness of fit should be visually compared to plots of other Iowa Curve dispersions and average lives for the selection of the appropriate curve and life. Detailed information for each account is shown later in this study and in workpapers.

Judgment

Any depreciation study requires informed judgment by the analyst conducting the study. A knowledge of the property being studied, company policies and procedures, general trends in technology and industry practice, and a sound basis of understanding depreciation theory are needed to apply this informed judgment. Judgment was used in areas such as survivor curve modeling and selection, depreciation method selection, simulated plant record method analysis, and actuarial analysis.

Judgment is not defined as being used in cases where there are specific, significant pieces of information that influence the choice of a life or curve. Those cases would simply be a reflection of specific facts into the analysis. Where there are multiple factors, activities, actions, property characteristics, statistical inconsistencies, implications of applying certain curves, property mix in accounts or a multitude of other considerations that impact the analysis (potentially in various directions), judgment is used to take all of these factors and synthesize them into a general direction or understanding of the characteristics of the property. Individually, no one factor in these cases may have a substantial impact on the analysis, but overall, may shed light on the utilization and characteristics of assets. Judgment may also be defined as deduction, inference, wisdom, common sense, or the ability to make sensible decisions. There is no single correct result from statistical analysis; hence, there is no answer absent judgment. At the very least for example, any analysis requires choosing which bands to place more emphasis.

The establishment of appropriate average service lives and retirement dispersions for each account requires judgment to incorporate the understanding of the operation of the system with the available accounting information analyzed using the Retirement Rate actuarial methods. The appropriateness of lives and curves depends not only on statistical analyses, but also on how well future retirement patterns will match past retirements.

Current applications and trends in use of the equipment also need to be factored into life and survivor curve choices in order for appropriate mortality characteristics to be chosen.

Average Life Group Depreciation

The California Public Utilities Commission published Standard Practice U-4-W in 1961 which directs how utilities compute depreciation accruals. All utilities in California are to use the straight-line, average life group, remaining life depreciation system. Thus CAW's current rates are based on the use of the average life group ("ALG") depreciation procedure. Continuing the same depreciation system, this study uses the ALG depreciation procedure to group the assets within each account. After an average service life and dispersion were selected for each account, those parameters were used to estimate what portion of the surviving investment of each vintage was expected to retire. The depreciation of the group continues until all investment in the vintage group is retired. ALG groups are defined by their respective account dispersion, life, and salvage estimates. A straight-line rate for each ALG group is calculated by computing a composite remaining life for each group across all vintages within the group, dividing the remaining investment to be recovered by the remaining life to find the annual depreciation expense and dividing the annual depreciation expense by the surviving investment. The resultant rate for each ALG group is designed to recover all retirements less net salvage when the last unit retires. The ALG procedure recovers net book cost over the life of each account by averaging many components.

Theoretical Depreciation Reserve

The book depreciation reserve was derived from Company records where the provision for depreciation is maintained on a plant account level. As a point of comparison, a theoretical depreciation reserve model was computed for each account. This study used a reserve model that relied on a prospective concept relating future retirement and accrual patterns for property, given current life and salvage estimates. The theoretical reserve of a group is developed from the estimated remaining life, total life of the property group, and estimated net salvage. The theoretical reserve represents the portion of the group cost that would have been accrued if current forecasts were used throughout the life of the group for future depreciation accruals. The computation involves multiplying the vintage balances within the group by the theoretical reserve ratio for each vintage. The average life group method requires an estimate of dispersion and service life to establish how much of each vintage is expected to be retired in each year until all property within the group is retired. Estimated average service lives and dispersion determine the amount within each average life group. The straight-line remaining-life theoretical reserve ratio at any given age (RR) is calculated as:

$$RR = 1 - \frac{(Average\ Remaining\ Life)}{(Average\ Service\ Life)} * (1 - Net\ Salvage\ Ratio)$$

DETAILED DISCUSSION

Depreciation Study Process

This depreciation study encompassed four distinct phases. The first phase involved data collection and field interviews. The second phase was where the initial data analysis occurred. The third phase was where the information and analysis was evaluated. Once the first three stages were complete, the fourth phase began. This phase involved the calculation of depreciation rates and documentation of the corresponding recommendations.

During the Phase 1 data collection process, historical data was compiled from continuing property records and general ledger systems. Data was validated for accuracy by extracting and comparing to multiple financial system sources. Audit of this data was validated against historical data from prior periods, historical general ledger sources, and field personnel discussions. This data was reviewed extensively to put in the proper format for a depreciation study. Further discussion on data review and adjustment is found in the Salvage Considerations Section of this study. Also, as part of the Phase 1 data collection process, numerous discussions were conducted with Company engineers and field operations personnel to obtain information that would assist in formulating life and salvage recommendations in this study. One of the most important elements of performing a proper depreciation study is to understand how the Company utilizes assets and the environment of those assets. Interviews with engineering and operations personnel are important steps to allow the analyst to obtain information that is beneficial when evaluating the output from the life and net salvage programs in relation to the Company's actual asset utilization and environment. Information that was gleaned in these discussions is found both in the Detailed Discussion of this study in the life analysis and salvage analysis sections and also in workpapers.

Phase 2 is where the actuarial or SPR analysis is performed. Phases 2 and 3 overlap to a significant degree. The detailed property records information is used in Phase 2 to develop statistics and graphical representations of how various industry standard retirement patterns match the actual experience of the company for life analysis. These statistics are analyzed, and tables are visually compared to company's experience to determine historical life characteristics. It is possible that the analyst would cycle back to this phase based on the evaluation process performed in Phase 3. Net salvage analysis consists of compiling historical salvage and removal data by functional group to determine values and trends in gross salvage and removal cost. This information was then carried forward into phase 3 for the evaluation process.

Phase 3 is the evaluation process which synthesizes analysis, interviews, and operational characteristics into a final selection of asset lives and net salvage parameters. The historical analysis from Phase 2 is further enhanced by the incorporation of recent or future changes in the characteristics or operations of assets that were revealed in Phase 1. Phases 2 and 3 allow the depreciation analyst to validate the asset characteristics as seen in the accounting transactions with actual Company operational experience.

Finally, Phase 4 involved the calculation of accrual rates, making recommendations, and documenting the conclusions in a final report. The calculation of accrual rates is found in Appendix A. Recommendations for the various accounts are contained within the Detailed Discussion of this report. The depreciation study flow diagram shown as Figure 1³ documents the steps used in conducting this study. Depreciation Systems, page 289 documents the same basic processes in performing a depreciation study which are: statistical analysis, evaluation of statistical analysis, discussions with management, forecast assumptions, write logic supporting forecasts and estimation, and write final report.

³ Introduction to Depreciation for Public Utilities and Other Industries, AGA EEI, 2013

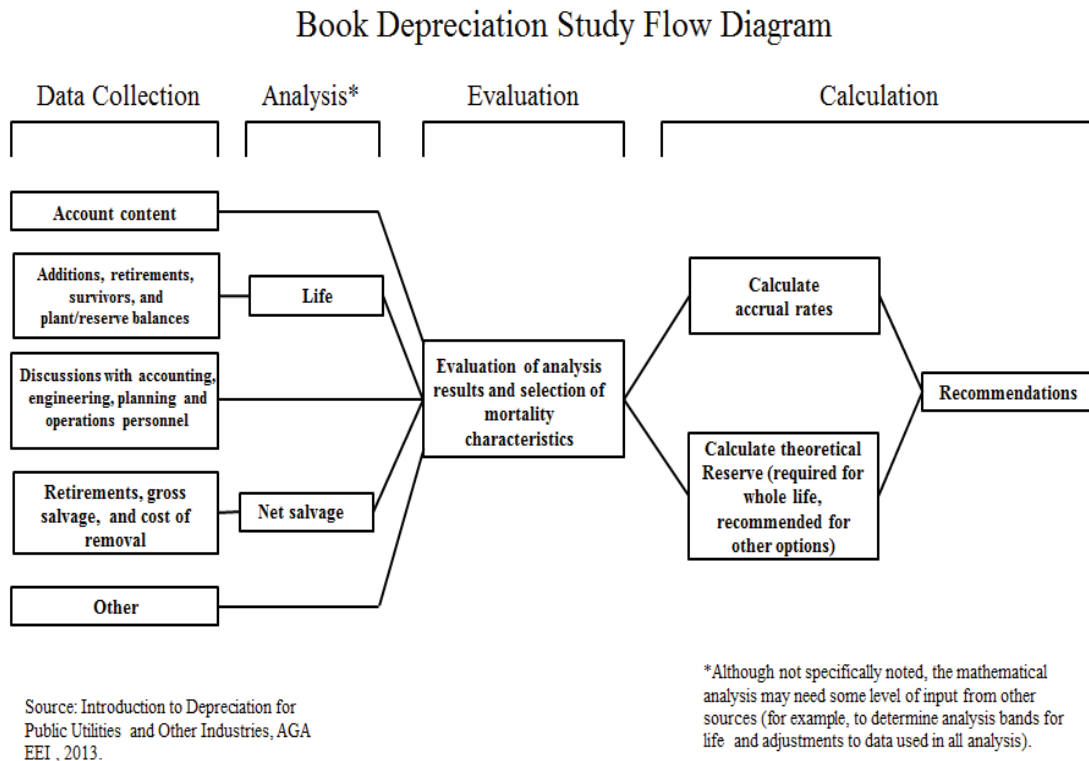


Figure 1

CALIFORNIA AMERICAN WATER DEPRECIATION STUDY PROCESS

Depreciation Rate Calculation

Annual depreciation expense amounts for the depreciable accounts of CAW were calculated by the straight-line method, ALG procedure, and the remaining life technique. With this approach, remaining lives were calculated according to standard ALG group expectancy techniques, using the Iowa Curves noted in the calculation. For each plant account, the difference between the surviving investment, adjusted for estimated net salvage, and the book depreciation reserve, was divided by the average remaining life to yield the annual depreciation expense. These calculations are shown in Appendix B.

Remaining Life Calculation

The establishment of appropriate average service lives and retirement dispersions for each account within a functional group was based on engineering judgment that incorporated available accounting information analyzed using the Retirement Rate actuarial methods. After establishment of appropriate average service lives and retirement dispersion, remaining life was computed for each account. Theoretical depreciation reserve with zero net salvage was calculated using theoretical reserve ratios as defined in the theoretical reserve portion of the General Discussion section. The difference between plant balance and theoretical reserve was then spread over the ALG depreciation accruals. Remaining life computations are found for each account in the workpapers.

Reserve Reallocation

Reserve reallocation occurs when the book reserve is re-spread within a functional group based on the theoretical reserve within each function. As part of the depreciation analysis, this study performed reserve reallocation to properly align the Company's depreciation reserve with the life and net salvage characteristics of the various functions. In the process of analyzing the Company's depreciation reserve, it was observed that the depreciation reserve positions of the accounts were generally not in line with the life characteristics

found in the analysis of the Company's assets. To allow the relative reserve positions of each account within a function to mirror the life characteristics of the underlying assets, the depreciation reserves for all accounts was reallocated within each function. Since the basis of the current depreciation rates vary between entities and jurisdictions, Alliance Consulting Group believes reserve reallocation is the best solution in developing one rate.

Reserve reallocation does not change the total reserve. The depreciation reserve represents the amounts that customers have contributed to the return of the investment. The reallocation process does not change the total reserve for each function; it simply reallocates the reserve between accounts in the function. Depreciation reserve reallocation is a sound depreciation practice endorsed by learned treatises. The practice of depreciation reserve allocation is endorsed in the 1968 publication of "Public Utility Depreciation Practices", National Association of Regulatory Utility Commissioners ("NARUC"), which explains that reallocation of the depreciation reserve is appropriate "...where the change in the view concerning the life of property is so drastic as to indicate a serious difference between the theoretical and the book reserve." Additionally, the 1996 edition of the NARUC publication states that "theoretical reserve studies also have been conducted for the purpose of allocating an existing reserve among operating units or accounts." The Depreciation Study demonstrates that there have been significant changes in the life of the property since the approved accrual rates were authorized. These changes have created a significant difference between the theoretical and the book reserve in each functional group that make the reallocation of the depreciation reserve appropriate in this instance.

It is important for the depreciation reserve to conform to the theoretical reserve because it sets the reserve at a level necessary to sustain the regulatory concept of intergenerational equity among CAW's customers, and also sets the depreciation rates at the appropriate level based on the study's proposed parameters and expectations. When the proposed depreciation rates are

approved, the Company will reallocate the reserves on its books using the approved parameters to match the allocation process performed in this study.

The reallocation for each district was performed at the function level. For water accounts, the functions used were source of supply, pumping equipment, treatment and disposal, transmission and distribution, and general plant. For wastewater plant, the functions used were collection plant, pumping equipment, treatment and disposal, and general plant. A summary of those results for each district and function are shown in Appendix E. Details of the reallocation are shown in the workpapers.

GRADUALISM

Specifically, in recent proceedings, the Commission has expressed concerns about growing cost burdens associated with increasing cost trends for negative net salvage and applied a principle of gradualism for these rates.⁴ The Commission explained that

[t]he principle of gradualism applies where there is a recognized need to revise estimated parameters, but where the change is allowed to occur incrementally over time rather than all at once. Applying gradualism thus limits the approved increase that would otherwise be warranted, all else being equal and mitigates the short-term impact of large changes in depreciation parameters. Also, it is advisable to be cautious in making large changes in estimates of service lives and net salvage for property that will be in service for many decades, as future experience may show the current estimates to be incorrect.⁵

The Commission gave specificity to this directive in D.14-08-032, instructing to “adopt no more than 25 percent of the estimated net salvage increase from

⁴ D-14-08-032 at 597.

⁵ *Id.*

current [net salvage] rates.”⁶ The Commission reiterative in D 15-11-021,⁷ and D-19-05-020.⁸ Since CAW was ordered to retain its existing depreciation rates and parameters in its last case, this exacerbates the Company’s recovery of removal costs. This study follows these directives in the selections for life and net salvage parameters for CAW’s depreciable and amortized assets. As this study addresses the net salvage parameters for each plant account this will be discussed further.

Life Analysis

The retirement rate actuarial analysis method was applied to some accounts within CAW. For each account, an actuarial retirement rate analysis was made with placement and experience bands of varying width. The historical observed life table was plotted and compared with various Iowa Curves to obtain the most appropriate match. A selected curve for each account is shown in the Life Analysis Section of this report. The observed life tables for all analyzed placement and experience bands are provided in workpapers.

For each account on the overall band (i.e., placement from earliest vintage year, which varied for each account, through 2020), approved survivor curves which were authorized in D-12-06-016 were used as a starting point. (Some accounts had available history beginning as early as 1999, while others had smaller experience bands available for analysis.) Then, using the same average life, various dispersion curves were plotted. Frequently, visual matching would confirm one specific dispersion pattern (e.g., L, S, or R) as an obviously better match than others. The next step was to determine the most appropriate life using that dispersion pattern. Next, placement bands of varying width were plotted with each experience band discussed above. Repeated matching usually

⁶ *Id.* at 600.

⁷ *Id.* at 413, 421, and 425.

⁸ A19-05-020 at 315 and 329.

pointed to a focus on one dispersion family and small range of service lives. The goal of visual matching was to minimize the differential between the observed life table and Iowa Curve in top and mid-range of the plots. These results are used in conjunction with all other factors that may influence asset lives.

In past depreciation studies, each division has been analyzed separately for Accounts 304-335. Interviews with Company subject matter experts (“SMEs”) recommended that the assets be combined for those account, since CAW operates their assets with a combined strategy and similar equipment across its service territory. In the past depreciation study, the SPR balances method was applied to all accounts for CAW that have sufficient history to analyze. However, SPR does not lend itself to analyzing history when there have been acquisitions of systems, which has occurred across CAW’s service territory. For that reason, SPR was not used on the common asset base. For consistency, one life was chosen for all districts. With the limitation that actuarial activity began around 2000, it was not possible to develop a complete survivor curve for long lived assets such as Accounts 331 and 335. In all cases, input from Company SMEs was used to develop the estimated life parameter.

Salvage Analysis

When a capital asset is retired, physically removed from service, and finally disposed of, terminal retirement is said to have occurred. The residual value of a terminal retirement is called gross salvage. Net salvage is the difference between the gross salvage (what the asset was sold for) and the removal cost (cost to remove and dispose of the asset). Salvage and removal cost percentages are calculated by dividing the current cost of salvage or removal by the original installed cost of the asset. Some plant assets can experience significant negative removal cost percentages due to the timing of the original addition versus the retirement. Inflation from the time of installation of the asset until the time of its removal must be taken into account in the calculation of the removal cost percentage because the depreciation rate, which

includes the removal cost percentage, will be applied to the original installed cost of assets.

Salvage Characteristics

For each account in the study, retirement, salvage, and removal cost were analyzed to the degree information was available. For all districts, net salvage was statistically analyzed using the historical cost for salvaging and removing assets with rolling and shrinking bands from 2001-2020. This study makes recommendations based on the analysis, discussions with Company personnel on policies and practices around salvage and cost of removal, and knowledge of types of assets routinely incurring salvage or cost of removal from experience with other utilities.

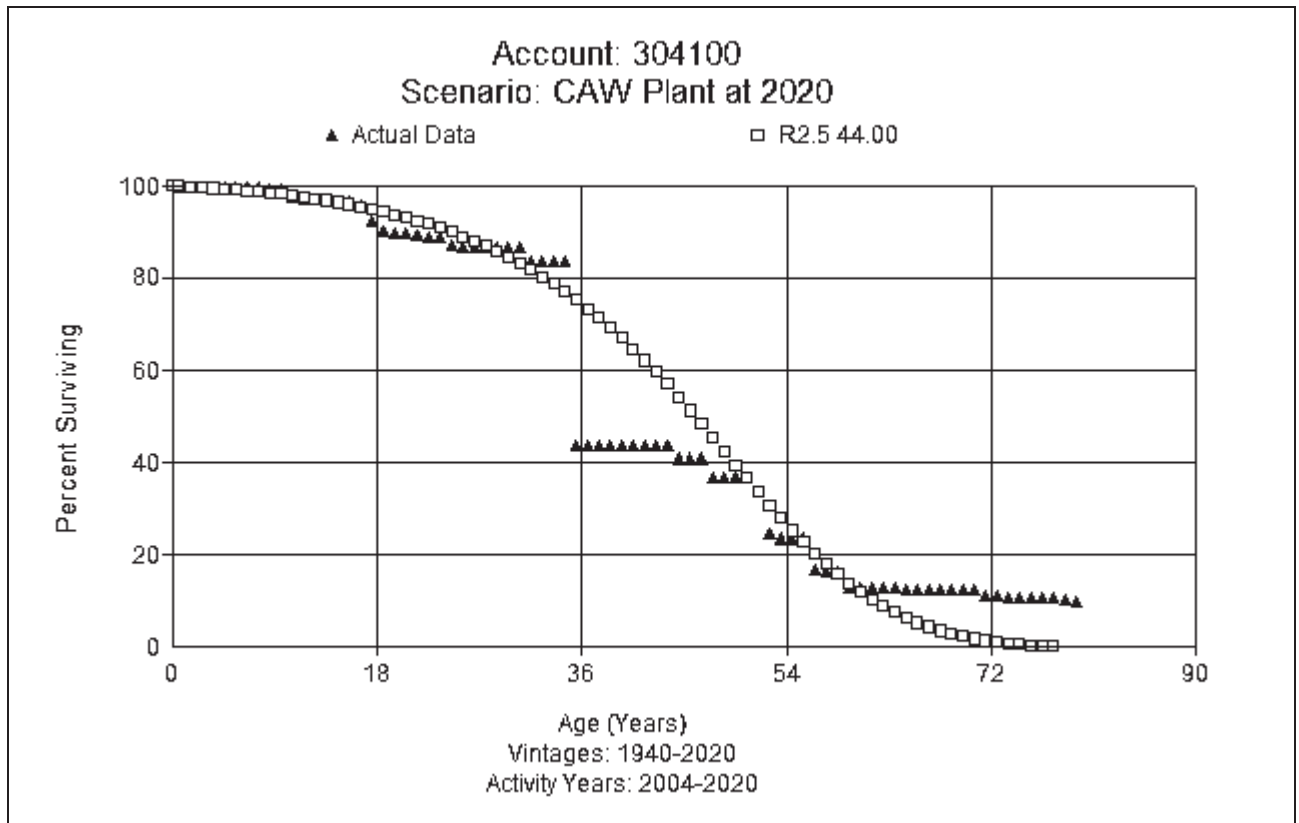
WATER ACCOUNT SPECIFIC INFORMATION

WATER Account 304100 Structures and Improvements Supply

This account consists of structures and improvements used in connection with source of supply.

LIFE ANALYSIS

The account balance is \$13.9 million for this account. The approved life characteristic for this account ranges between 26 and 40 years. Actuarial analysis shows a good visual match for a 44-year life with an R2.5 dispersion. This curve is shown below.



Based on the characteristics of the assets in the account, the actuarial analysis and judgment, this depreciation study recommends moving to a R2.5 44 dispersion curve for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$205,637	40 R5	44 R2.5
Los Angeles	\$1,055,710	26 R4	44 R2.5
Monterey Water	\$4,755,119	40 R5	44 R2.5
Sacramento	\$7,567,792	40 R5	44 R2.5
Ventura County	\$283,322	40 R5	44 R2.5

NET SALVAGE

The existing net salvage parameter varies by district, ranging from 0 percent to negative 5 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 75 and negative 83 percent respectively. These negative net salvage percentages are larger than typical for this account. Considering the small level of transactions in the account, the variability of the results over time, judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends a slight change to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

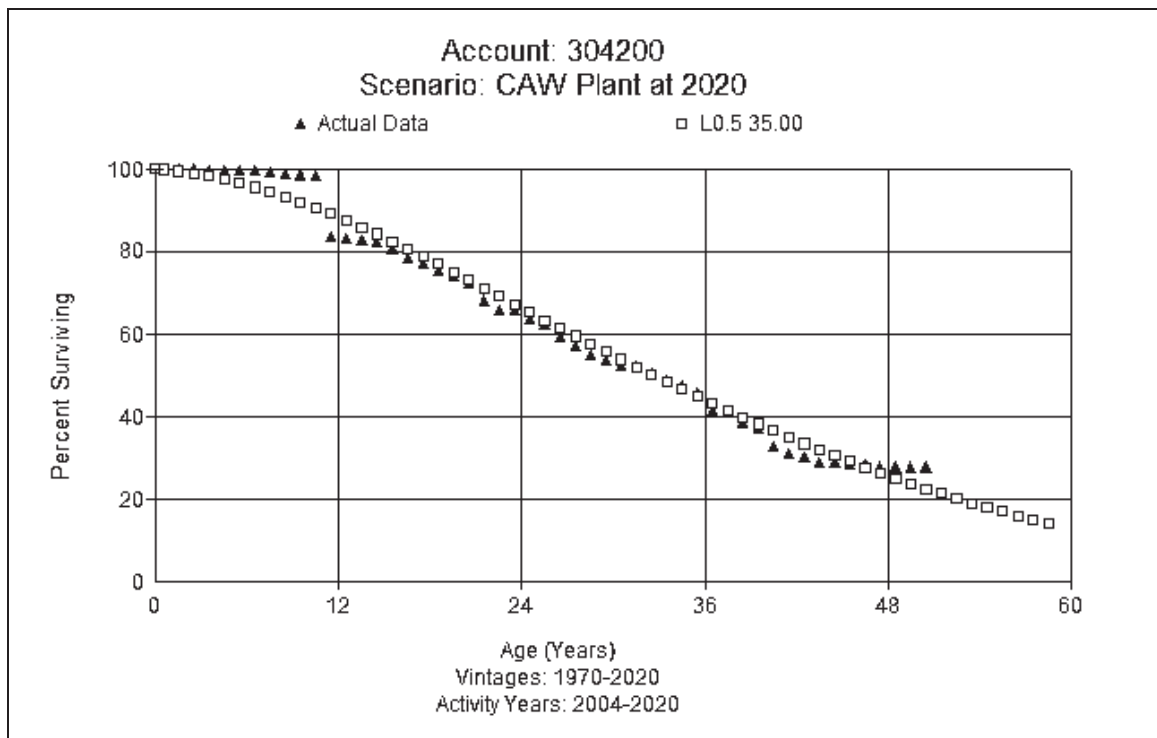
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-5%	-10%
Los Angeles	-5%	-10%
Monterey Water	-5%	-10%
Sacramento	0%	-10%
Ventura County	0%	-10%

WATER Account 304200 Structures and Improvements Pumping

This account consists of structures and improvements used in connection with pumping from the source of supply.

LIFE ANALYSIS

The account balance is \$24.4 million for this account. The current life for this account ranges from 35 to 65 years. Actuarial analysis shows a good visual match for a 35-year life with an L0.5 dispersion. This curve is shown below.



Based on the results of the actuarial analysis, the life expectations for the assets in the account, and judgment, this depreciation study recommends moving to a 35-year life with an L0.5 dispersion curve for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$0	35 S6	35 L0.5
Larkfield	\$224,544	65 R5	35 L0.5
Los Angeles	\$1,849,559	35 S6	35 L0.5
Monterey Water	\$6,303,388	65 S1.5	35 L0.5
Sacramento	\$15,028,299	65 L3	35 L0.5
Ventura County	\$1,029,987	65 R5	35 L0.5

NET SALVAGE

The existing negative net salvage parameter for all divisions are negative 20 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 136 and negative 30 percent respectively. These negative net salvage percentages are larger than typical for this account. Considering the Company history, judgment, and knowledge of the assets in this account, this depreciation study recommends a slight change to a consolidated negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

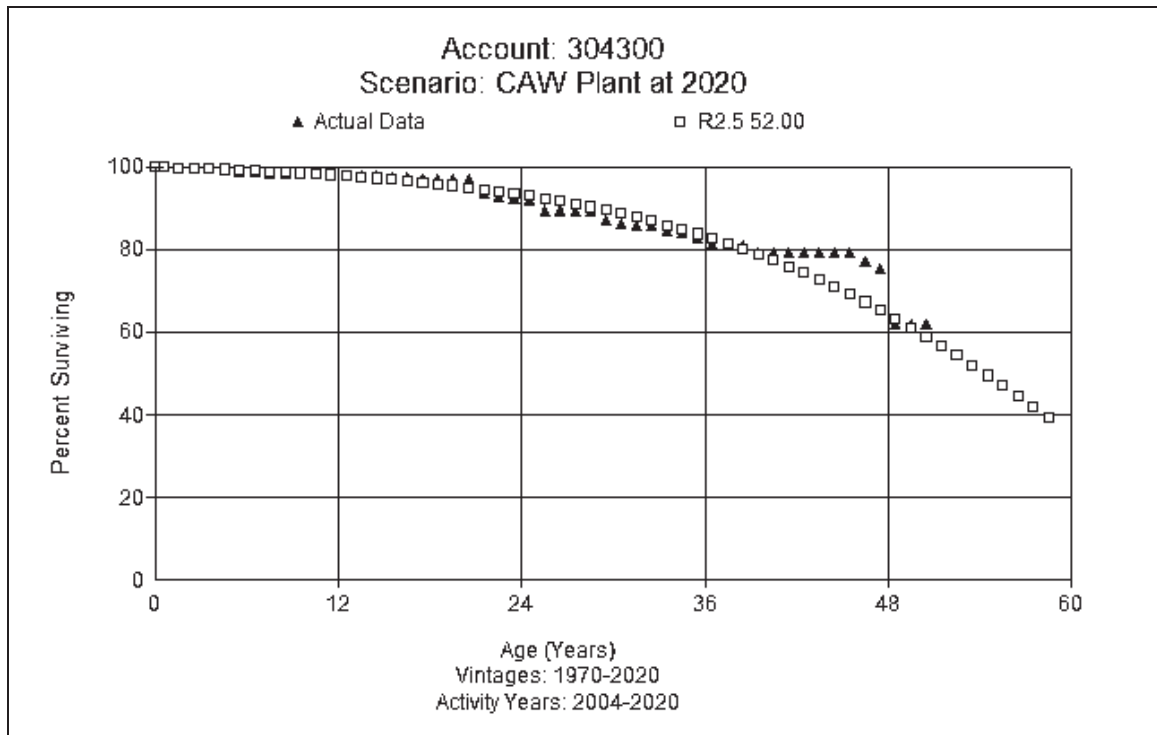
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Coronado	-20%	-10%
Larkfield	-20%	-10%
Los Angeles	-20%	-10%
Monterey Water	-20%	-10%
Sacramento	-20%	-10%
Ventura County	-20%	-10%

WATER Account 304300 Structures and Improvements Water Treatment

This account consists of structures and improvements used in connection with water treatment.

LIFE ANALYSIS

The account balance is \$21.3 million for this account. The current life for this account is 50 years. Company personnel confirm that an operational life around 50 years is reasonable for this account. Actuarial analysis shows a good visual match for a 52-year life with an R2.5 dispersion. This curve is shown below.



Based on the actuarial analysis judgment, this depreciation study recommends moving to a 52-year life with an R2.5 dispersion curve for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$442,703	50 R5	52 R2.5
Los Angeles	\$395,438	50 S6	52 R2.5
Monterey Water	\$10,095,455	50 R5	52 R2.5
Sacramento	\$10,321,972	50 L3	52 R2.5

NET SALVAGE

The existing negative net salvage parameter ranges from 0 to negative 5 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 353 and negative 111 percent respectively. These negative net salvage percentages are larger than typical for this account. Considering the Company history, variability of the transactions, judgment, and knowledge of the assets in this account, this depreciation study recommends a slight change to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

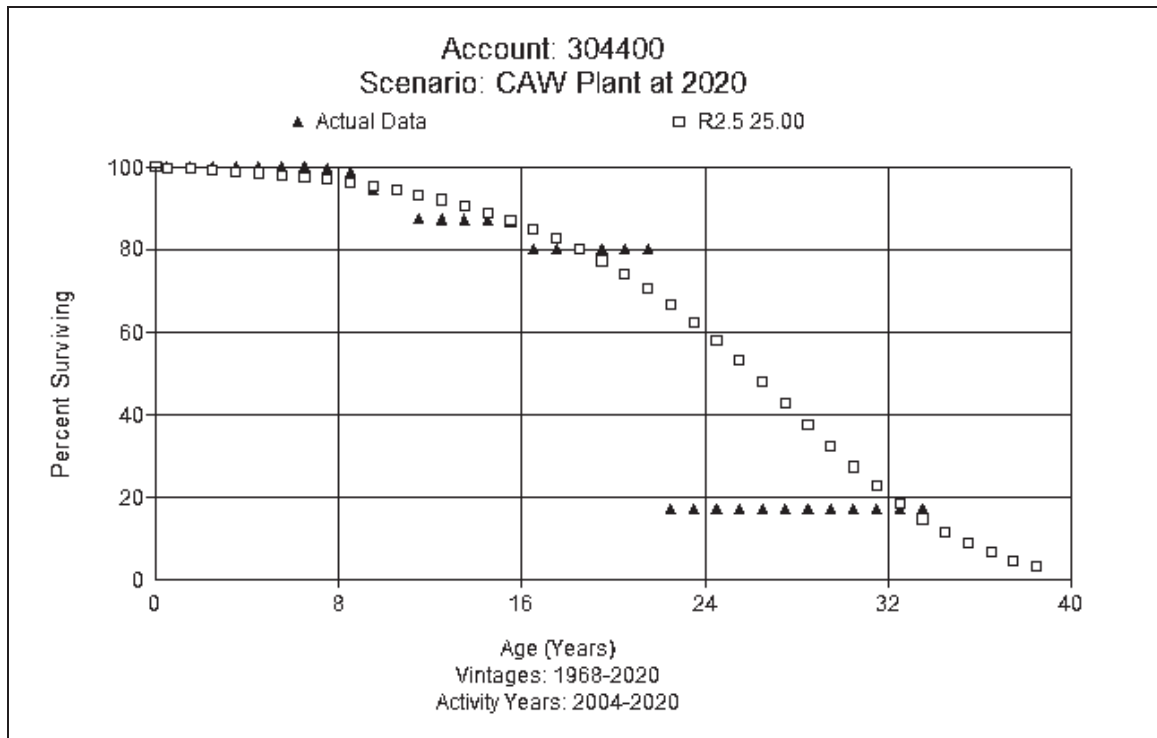
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-5%	-10%
Los Angeles	-5%	-10%
Monterey Water	-5%	-10%
Sacramento	0%	-10%

WATER Account 304400 Structures and Improvements T & D

This account consists of gross salvage and cost of removal for structures and improvements used in connection with transmission and distribution operations.

LIFE ANALYSIS

The plant balance in this account is \$3.1 million. The current life for this account includes no parameter and lives ranging from 25 years to 40 years. Actuarial analysis shows a good visual match for a 25-year life with an R2.5 dispersion. This curve is shown below.



Based on the limited actuarial analysis, the type of assets in the account and judgment, this depreciation study recommends moving to a 25-year life with an R2.5 dispersion curve for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$447,178	40 R5	25 R2.5
Los Angeles	\$101,365	25 S6	25 R2.5
Monterey Water	\$944,359	25 S1.5	25 R2.5
Sacramento	\$1,186,115	40 L3	25 R2.5
Ventura County	\$444,559	N/A	25 R2.5

NET SALVAGE

The existing negative net salvage parameter ranges from 0 to negative 5 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 100 and negative 127 percent respectively. These negative net salvage percentages are larger than typical for this account. Considering Company history, judgment and knowledge of the assets in this account, this depreciation study recommends a slight change to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

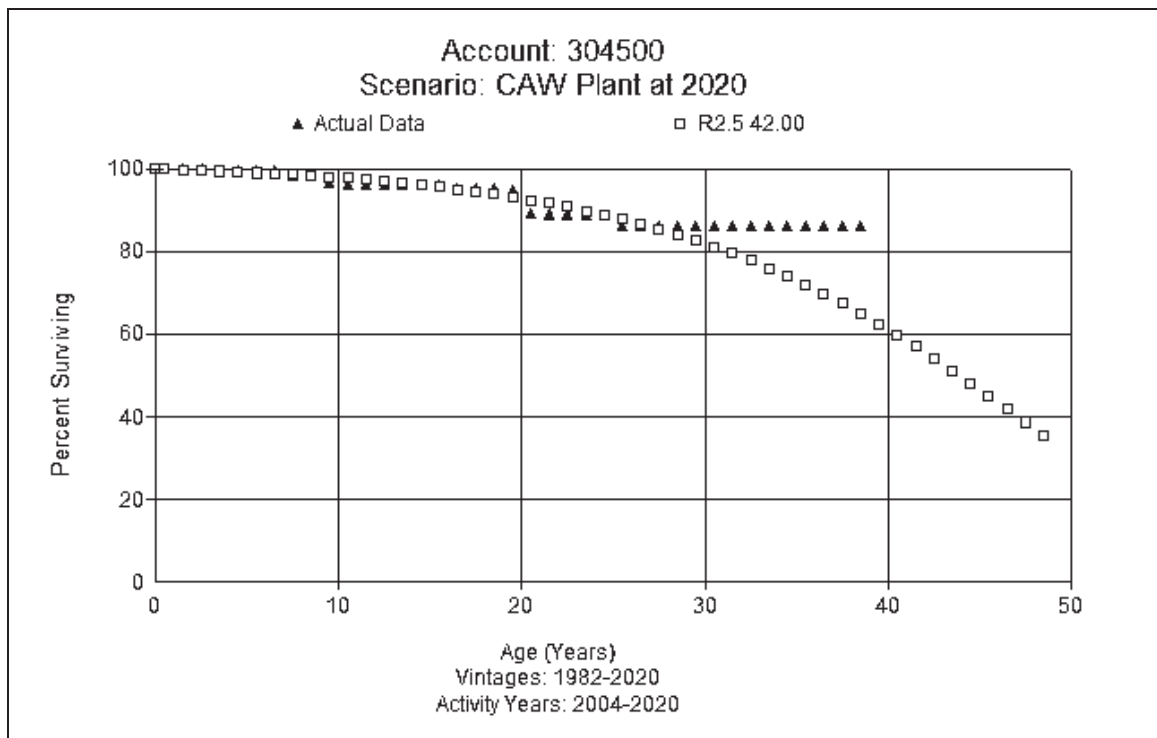
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-5%	-10%
Los Angeles	5%	-10%
Monterey Water	-5%	-10%
Sacramento	0%	-10%
Ventura County	0%	-10%

WATER Account 304500 Structures and Improvements General

This account consists of structures and improvements used in as general plant such as company offices.

LIFE ANALYSIS

The plant balance in this account is \$10.5 million. The current life for this account includes no parameter and lives ranging from 25 years to 44 years. Actuarial analysis shows a good visual match for a 42-year life with an R2.5 dispersion. This curve is shown below.



Based on the limited actuarial analysis and judgment, this depreciation study recommends moving to a 42-year life with an R2.5 dispersion curve for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$137,639	N/A	42 R2.5
Corporate	\$301,157	44 R5	42 R2.5
Larkfield	\$67,294	25 R2	42 R2.5
Los Angeles	\$468,144	44 R4	42 R2.5
Monterey Water	\$1,783,732	44 R4	42 R2.5
Sacramento	\$7,044,913	44 R4	42 R2.5
Ventura County	\$743,271	32 R2.5	42 R2.5

NET SALVAGE

The existing negative net salvage parameter ranges from 0 to negative 5 percent, with one district having no parameter. In the most recent transaction year, the 5-year and 10-year moving averages show negative 8 and negative 7 percent respectively. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends a uniform negative 5 percent net salvage for this account. A table showing parameters for each district is shown below.

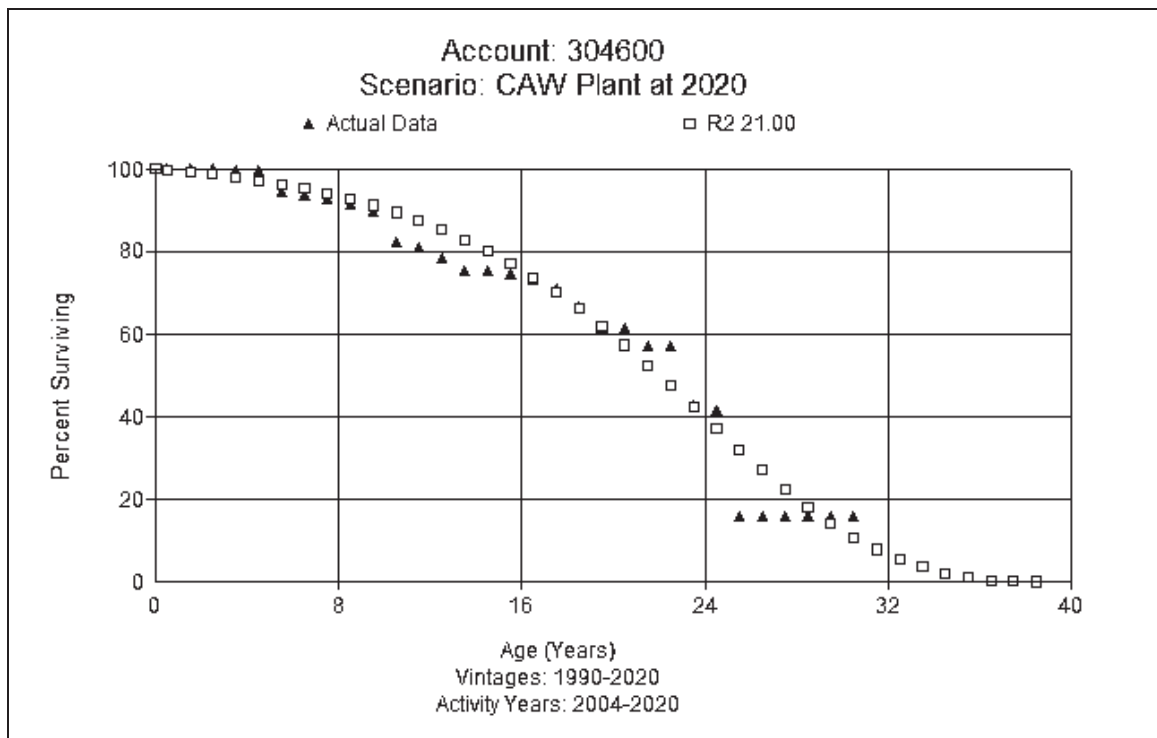
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Coronado	NA	-5%
Corporate	-5%	-5%
Larkfield	0%	-5%
Los Angeles	5%	-5%
Monterey Water	-5%	-5%
Sacramento	-5%	-5%
Ventura County	-5%	-5%

WATER Account 304600 Structures and Improvements Offices

This account consists of structures and improvements associated with the Ambler office.

LIFE ANALYSIS

The account balance is \$1.8 million for this account. The current life for this account ranges from 28 years to 33 years. Actuarial analysis shows a good visual match for a 21-year life with an R1 dispersion. This curve is shown below.



Based on the actuarial analysis and judgment, this depreciation study recommends moving to a 21-year life with an R2 dispersion curve for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$989,669	28 S6	21 R2
Larkfield		30 R2	21 R2
Los Angeles	\$354,252	33 S6	21 R2
Monterey Water	\$229,864	30 R4	21 R2
Village	\$243,298	32 R2.5	21 R2

NET SALVAGE

The existing negative net salvage parameter ranges from positive 5 percent to negative 5 percent, with one district having no parameter. In the most recent transaction year, the 5-year and 10-year moving averages show negative 35 and negative 8 percent respectively. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends a consolidation to negative 5 percent net salvage for this account. A table showing parameters for each district is shown below.

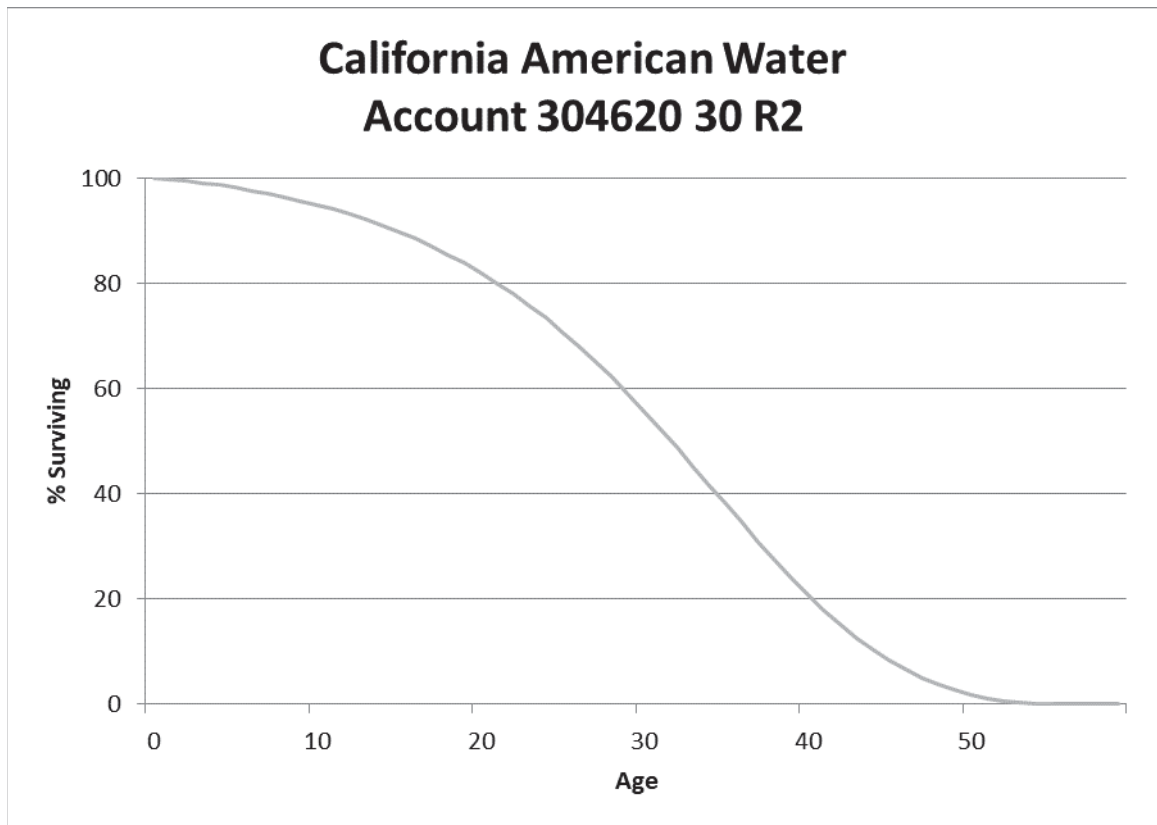
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Coronado	-5%	-5%
Larkfield	0%	-5%
Los Angeles	5%	-5%
Monterey Water	-5%	-5%
Village	-5%	-5%

WATER Account 304620 Structures and Improvements Leaseholds

This account consists of structures and improvements associated with the leased buildings.

LIFE ANALYSIS

The account balance is \$14 thousand for this account. The current life is 30 years with an R2 dispersion. There is no history in this account to perform actuarial analysis. Based on judgment, this study recommends retention of the existing 30-year life with an R2 dispersion. A generic curve is shown below.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Corporate	\$0	30 R2	30 R2
Ventura County	\$14,135	N/A	30 R2

NET SALVAGE

The existing negative net salvage parameter is 0 percent. In the most recent transaction year, the 5-year and 10-year moving averages show 0 and negative 3 percent respectively. Considering judgment, Company history, knowledge of the assets in this account, and the recommendation for Account 304600, this depreciation study recommends a slight change to negative 5 percent net salvage for this account. A table showing parameters for each district is shown below.

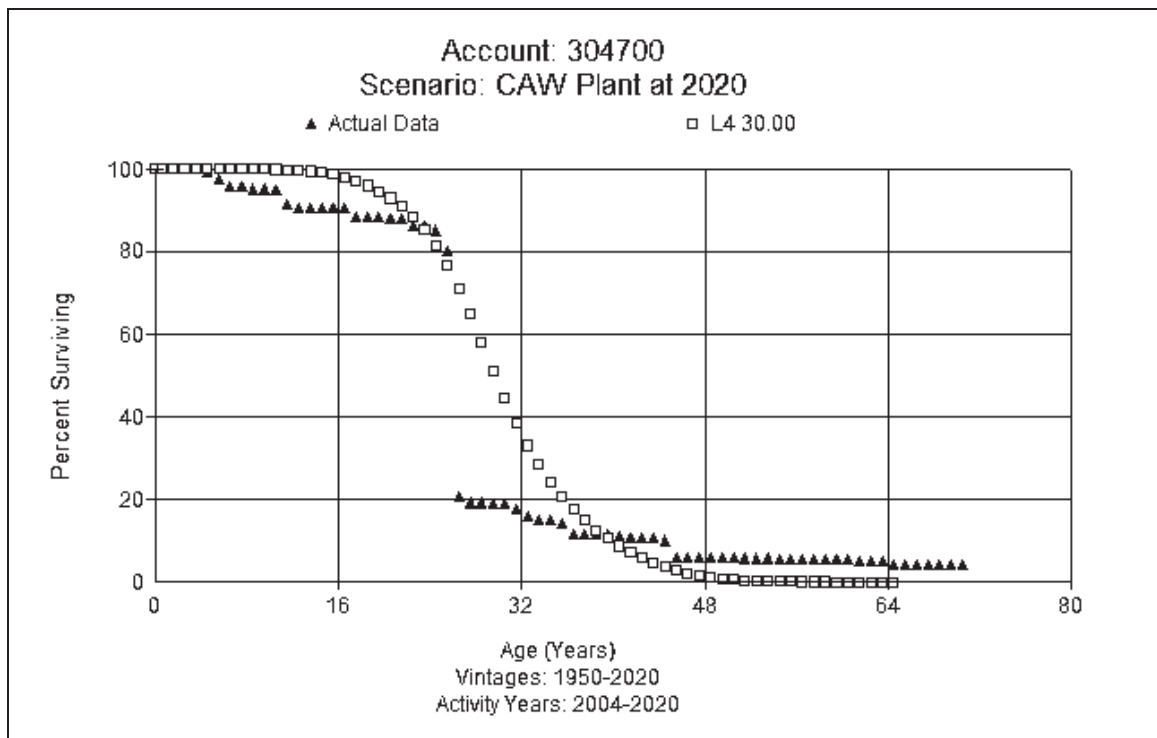
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Corporate	0%	-5%
Ventura County	0%	-5%

WATER Account 304700 Structures and Improvements Tools, Shop and Garage Equipment

This account consists of structures and improvements used in connection with tools, shop, and garage operations.

LIFE ANALYSIS

The account balance is \$754 thousand for this account. The current life for this account includes no parameter and lives ranging from 28 years to 40 years. Actuarial analysis shows a good visual match for a 30-year life with an L4 dispersion. This curve is shown below.



Based on actuarial analysis and judgment, this study recommends a 30-year life with an L4 dispersion for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$107,996	28 S6	30 L4
Larkfield			30 L4
Los Angeles	\$277,052	33 S6	30 L4
Monterey Water	\$166,314	40 R5	30 L4
Sacramento	\$308,573		30 L4
Ventura County	\$2,070	32 R2.5	30 L4

NET SALVAGE

The existing negative net salvage parameter ranges between 0 and negative 5 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 282 and negative 7 percent respectively. Considering judgment, Company history, knowledge of the assets in this account, and the recommendation for Account 304600, this depreciation study recommends a consolidation to negative 5 percent net salvage for this account. A table showing parameters for each district is shown below.

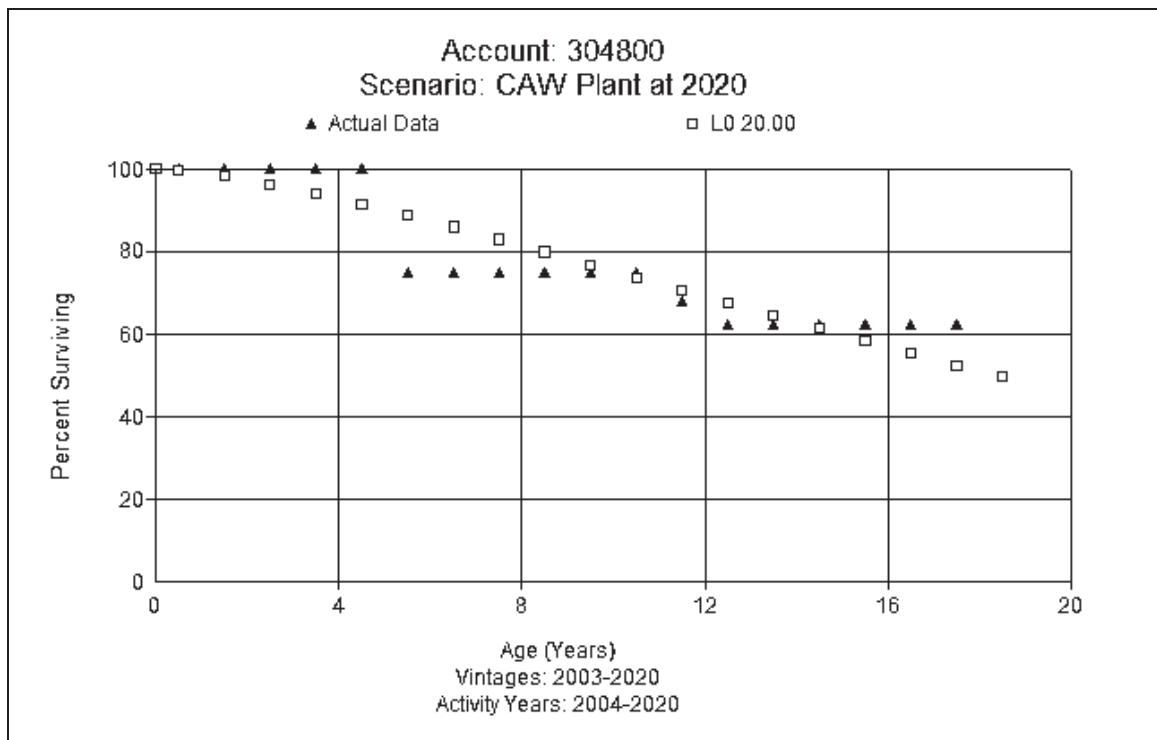
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Coronado	-5%	-5%
Larkfield	0%	-5%
Los Angeles	-5%	-5%
Monterey Water	-5%	-5%
Sacramento	0%	-5%
Ventura County	-5%	-5%

WATER Account 304800 Structures and Improvements Miscellaneous

This account consists of miscellaneous structures and improvements such as gates, filters, and security apparatus.

LIFE ANALYSIS

The account balance is \$116 thousand for this account. The current life is 20 years. After performing actuarial analysis, a 20-year life with an L0 dispersion is a good visual fit. A curve comparing the observed life table and the Iowa Curve is shown below.



Based on the actuarial analysis and judgment, retaining a 20-year life with an L0 dispersion is recommended for his account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Monterey Water	\$115,948	20 R4	20 L0

NET SALVAGE

The existing negative net salvage parameter is negative 5 percent. In the most recent transaction year, the 10-year moving average shows 0 percent. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends a slight change to 0 percent net salvage for this account. A table showing parameters for each district is shown below.

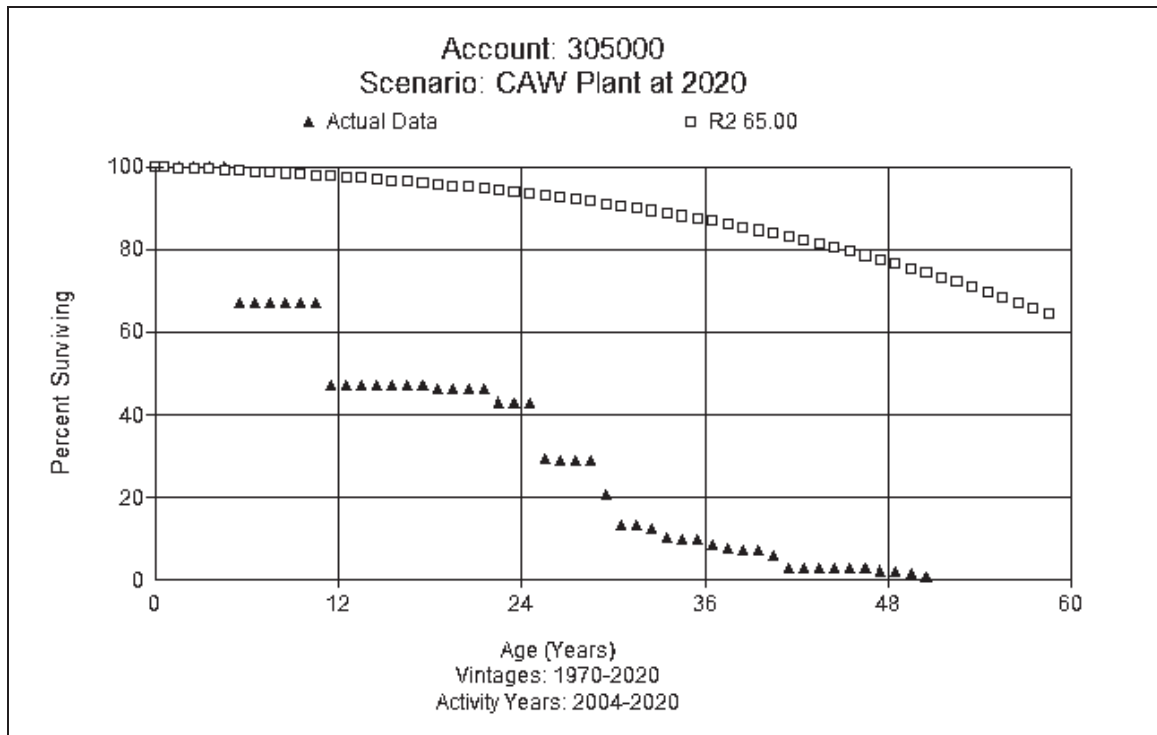
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Monterey Water	-5%	0%

WATER Account 305000 Collecting and Impounding Reservoirs

This account consists of structures and improvements used for impounding, collecting, and storing water such as aerators, bridges, and culverts.

LIFE ANALYSIS

The account balance is \$1.9 million for this account. The current life ranges from 60 to 65 years. Actuarial analysis shows a short life (under 20 years) driven by retirements at the San Clemente Dam which are atypical for this account. Based on judgment, a 65-year life with an R2 dispersion is proposed for this account.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$55,920	65 R2	65 R2
Monterey Water	\$1,815,478	60 S4	65 R2

NET SALVAGE

This existing net salvage percentage for this account is 0 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 9 and negative 6 percent respectively. Given the small amount of activity, this study does not recommend a change in the current net salvage parameter for this account. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends retention of 0 percent net salvage for this account. A table showing parameters for each district is shown below.

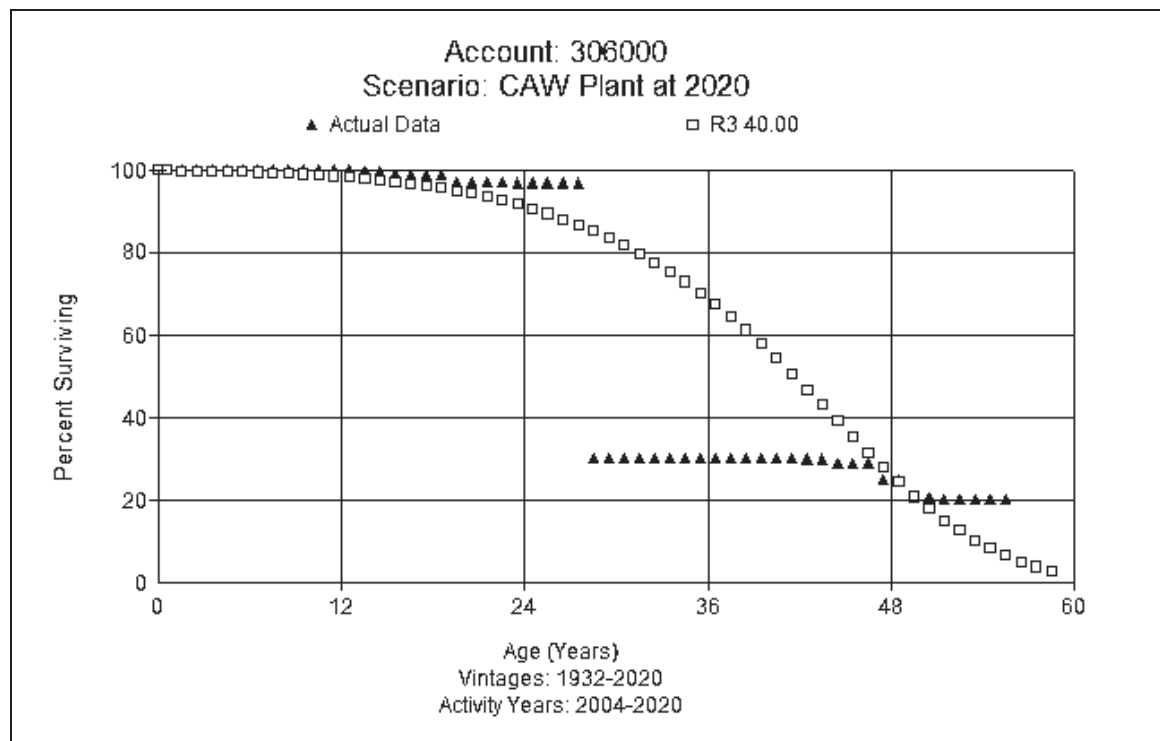
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Monterey Water	0%	0%
Sacramento	0%	0%

WATER Account 306000 Lake, River and Other Intakes

This account consists of lake, river, and other intakes used as a source of water. Such items might include conduit, fences, intake pipes, intake wells, or lighting systems.

LIFE ANALYSIS

The plant balance in this account is \$1.3 million. The current life of this account ranges from 30 years to 40 years. Company SMEs report that 40 years is a reasonable operational life for this equipment. Many of the assets in Ventura County are SCADA equipment. After performing actuarial analysis, the 40-year life with an R3 dispersion is a good visual fit for this account. A comparison of the observed life table and Iowa Curve is shown below.



Based on judgment, input from Company personnel, and historical activity, a 40-year life with an R3 dispersion is proposed for this account.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$350,313	40 R3	40 R3
Monterey Water	\$57,852	40 S4	40 R3
Sacramento	\$12,735	30 SQ	40 R3
Ventura County	\$910,276	40 R3	40 R3

NET SALVAGE

This existing net salvage percentage for this account ranges from 0 percent to negative 5%. In the most recent transaction year, the 5-year and 10-year moving averages show negative 196 and negative 15 percent respectively. Given the small amount of activity, this study does not recommend a change in the current net salvage parameter for this account. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends a consolidated 0 percent net salvage for this account. A table showing parameters for each district is shown below. A table showing parameters for each district is shown below.

District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	-5%	0%
Ventura County	0%	0%

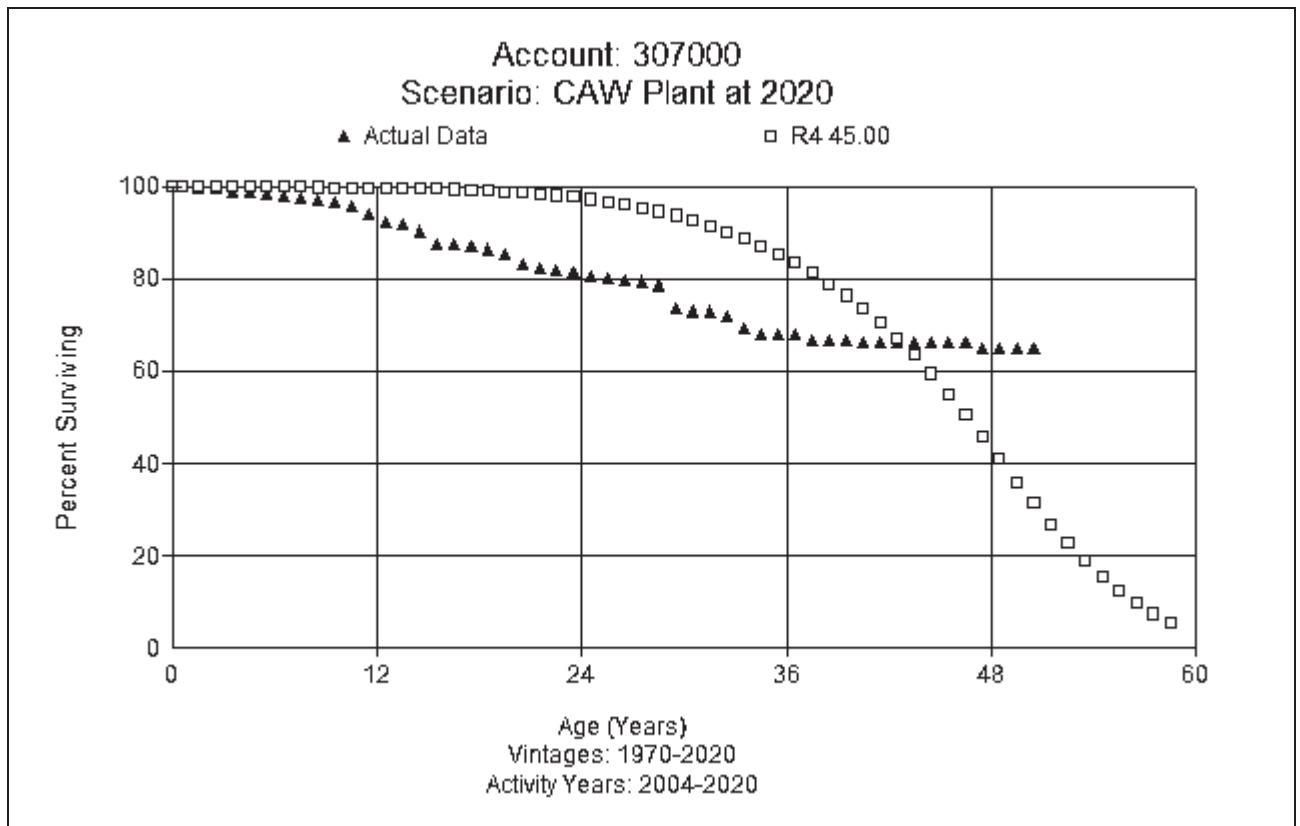
WATER Account 307000 Wells and Springs

This account consists of wells and springs used as a source of water supply. Such items might include collecting basins, fences, or wells, casings, and appurtenances.

LIFE ANALYSIS

The plant balance in this account is \$58.4 million. The current life for this account ranges from 29 years to 45 years. Company personnel state that there is no operational reason for the life to move longer than currently approved. The Company drilled a number of wells in 2004-2006 and some are already showing signs of degradation. In some aquifers, the wells will plug fairly quickly. In the Southern region, there are several wells older than 55 years, and various components such as motors pumps and sometimes packers/liners have been replaced. There are several redrill/new well projects in process. The Company is seeing that they need to add more treatment equipment to the wells in LA area. Adding treatment could have the effect of extending the life of the well. With drought conditions, some wells in the LA area are declining in pumping capacity. The Company may have to rehab or drill wells deeper due to that issue.

Some of the actuarial analyses suggest a life in the 60-year range, but that does not align with operational expectations and industry norms for other accounts in this grouping. A graph of the observed life table compared to the proposed Iowa Curve is shown below.



This study proposes consolidating to a 45-year life for all districts with an R4 dispersion. A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$1,964,484	45 R4	45 R4
Los Angeles	\$15,727,891	45 R3	45 R4
Monterey Water	\$14,618,454	29 R3	45 R4
Sacramento	\$26,084,195	45 R3	45 R4

NET SALVAGE

This existing net salvage percentage for this account is negative 50

percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 107 and negative 66 percent respectively. These amounts are driven by large cost of removal in 2019 and 2020. If one examines the moving averages in 2018 without those large transactions, the 10-year moving average is negative 26 percent and the 15-year moving average is negative 27 percent. Given the potential swing in 2019 and 2020, this study recommends a reduction in negative net salvage for this account. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 20 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Los Angeles	-50%	-20%
Monterey Water	-50%	-20%
Sacramento	-50%	-20%
Ventura County	-50%	-20%

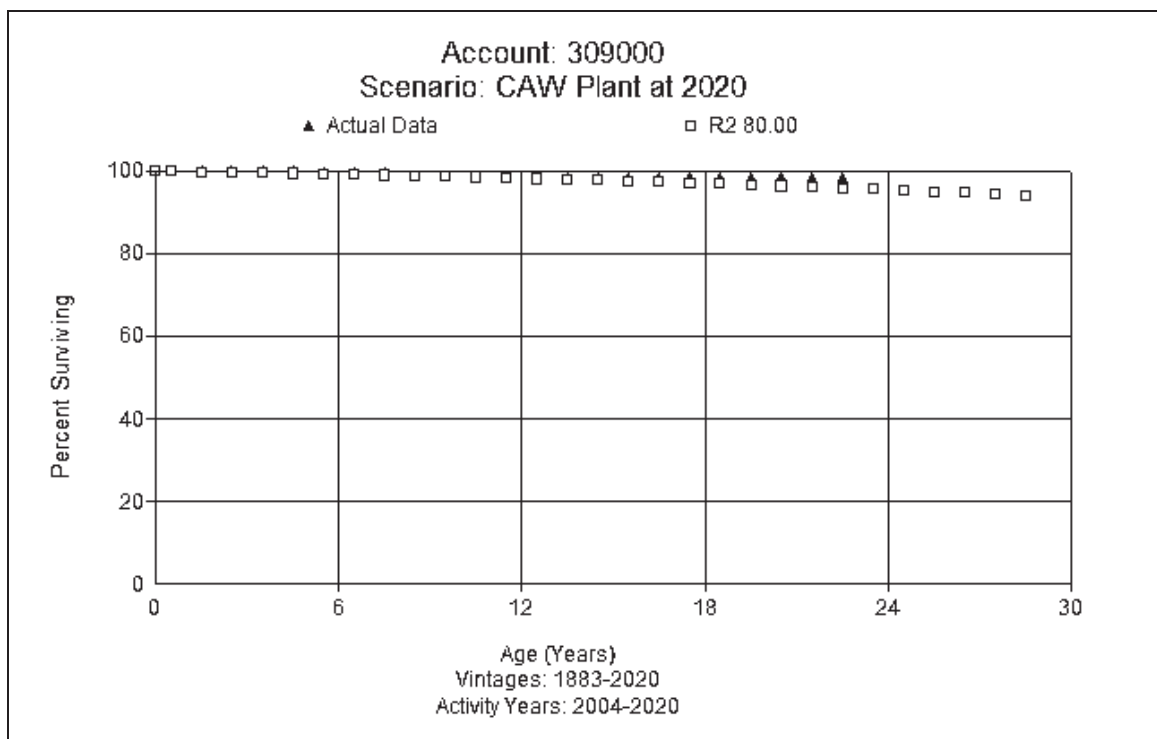
WATER Account 309000 Supply Mains

This account consists of supply mains, pipes, aqueducts, and canals and their appurtenances. Such items might include air chambers, blow-offs and overflows, canals, manholes, and mains.

LIFE ANALYSIS

The plant balance in this account is \$12.6 million. The current life for this account is 70 years. Even though a small number of retirements have occurred over the experience period, it is not sufficient for actuarial analysis of a long-lived account. Company SMEs state that the life of this account will be similar to Account 331 – Transmission and Distribution Mains. There were a number of assets retired with the Dam and more are to be removed and not replaced. The shorter life seen in the analysis is not operationally reasonable.

A plot of the observed life table and the proposed curve is shown below.



Based on input from Company SMEs and actuarial analysis, this study

recommends an 80-year life with an R2 dispersion.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$172,839	70 R2	80 R2
Los Angeles	\$292,088	70 L0	80 R2
Monterey Water	\$4,968,688	70 S6	80 R2
Sacramento	\$6,722,161	70 R1	80 R2
Ventura County	\$424,085	70 R5	80 R2

NET SALVAGE

This existing net salvage percentage for this account is ranges from negative 30 to negative 70 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 137 and negative 25 percent respectively. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 25 percent net salvage for this account. A table showing parameters for each district is shown below.

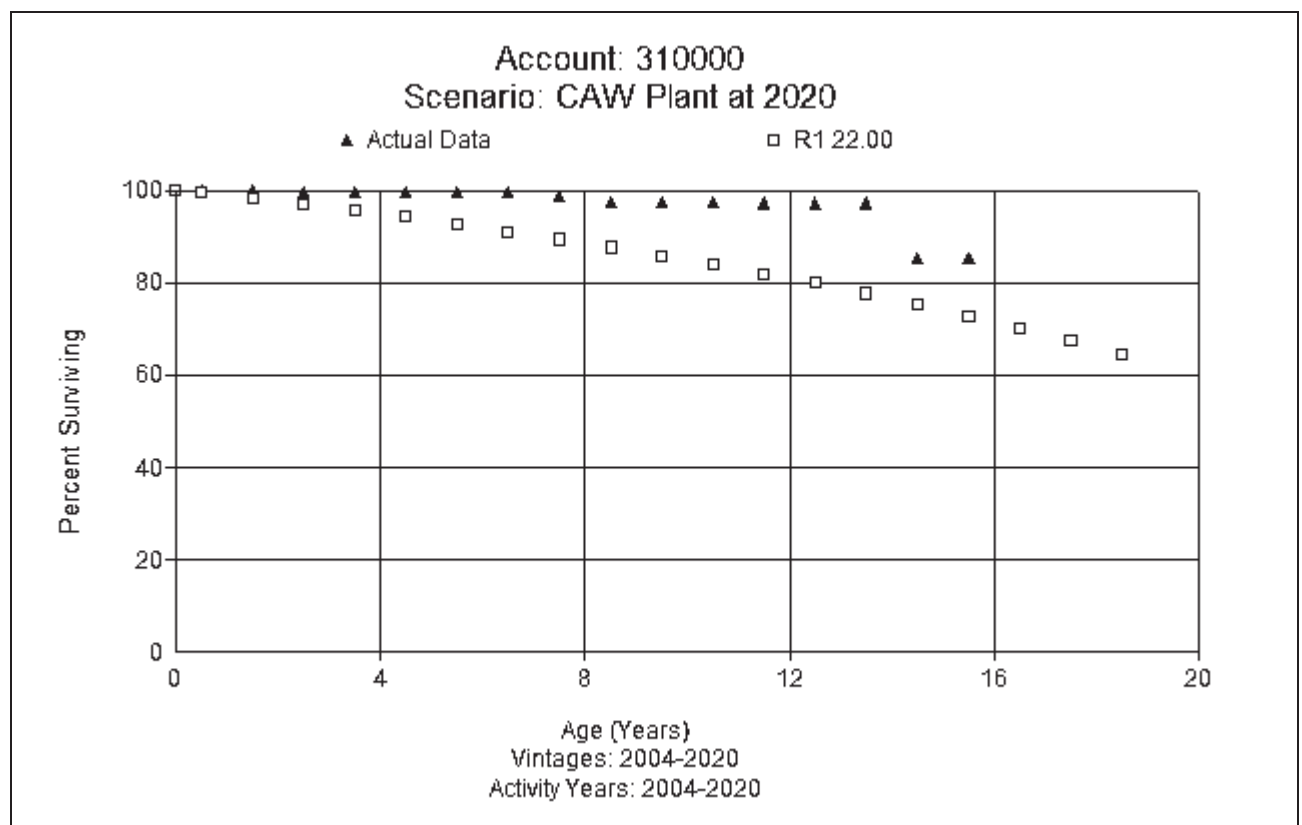
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-30%	-25%
Los Angeles	-35%	-25%
Monterey Water	-50%	-25%
Sacramento	-70%	-25%
Ventura County	-30%	-25%

WATER Account 310000 Power Generation Equipment

This account consists of any equipment used for the production of power principally used in pumping operations.

LIFE ANALYSIS

The plant balance in this account is \$4.8 million. The current life of this account ranges from 22 to 28 years. Since the account is relatively new (about 20 years old), there is a limited history to analyze. Based on judgment, this study recommends a 22-year life with an R1 dispersion, which is the existing parameter for three districts. A plot of the observed life table and the proposed curve is shown below.



Based on actuarial analysis and judgment, this study recommends a 22-year life with an R1 dispersion.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$5,367	22 R1	22 R1
Los Angeles	\$5,940	22 R1	22 R1
Monterey Water	\$1,889,700	22 R1	22 R1
Sacramento	\$2,906,545	28 S6	22 R1

NET SALVAGE

This existing net salvage percentage for this account is negative 15 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 50 and negative 45 percent respectively. A large removal cost in 2019 may be distorting results in the most current transaction year. The moving average in 2018 for the 5-year and 10-year periods is negative 18 and negative 20 percent respectively. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-15%	-10%
Los Angeles	-15%	-10%
Monterey Water	-15%	-10%
Sacramento	-15%	-10%

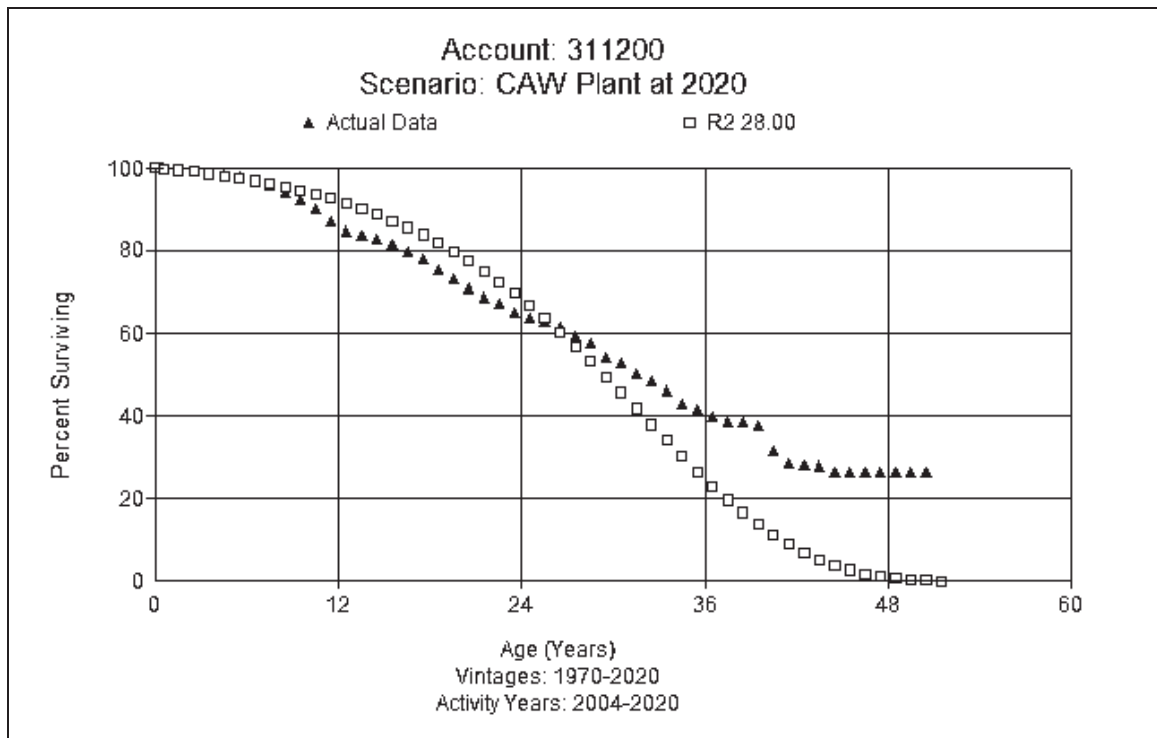
WATER Account 311200 Pumping Equipment Electric

This account consists of pumping equipment driven by electric power.

LIFE ANALYSIS

The plant balance in this account is \$79.6 million. The current life of this account ranges from 27 to 29 years. Overall, Company personnel find that components in this account have different lives: structures (20–60-year range); pumping equipment (15–35-year range); and other pumping equipment (15–25-year range). Company SMEs report that there are challenges with electrical supply. There are still a lot of systems on 3-wire systems (which would stress the motors). Challenges exist for pumping when the hydraulics are not ideal. The Company has one of the most complex systems in the US, and there are some variables depending on location. Monterey sees pumps and motors run very hard. They are lucky to get 10-15 years out of the electrical equipment (e.g., motors) in this area due to both the stress on the system and the salt environment. The Company is trying more active conditioning of the electrical components in the expectation of a slightly longer life in the future. This type of asset should have a consistent life across all divisions. The Southern division has many older facilities. In LA, they are replacing pumps/motors that are inefficient due to SCE rebates for replacements. Ventura County has facilities that are 20-40 years old and shares many of the same characteristics as LA (which has 40-60 year old facilities). The motors and pumps would likely have been replaced over time. The condition-based assessments from the last GRC address both the replacement of pumps/motors and booster stations as well.

After performing actuarial analysis, this account shows a good visual match to a 28-year life with an R2 dispersion. The Iowa Curve compared to the observed life table is shown below.



Based on Company history, actuarial analysis, input from Company SMEs and judgment, this study recommends a 28-year life with an R2 dispersion.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$131,287	28 S6	28 R2
Larkfield	\$944,365	28 S6	28 R2
Los Angeles	\$13,655,859	28 R1	28 R2
Monterey Water	\$22,000,036	29 L1	28 R2
Sacramento	\$37,675,011	28 S6	28 R2
Ventura County	\$5,236,399	27 S6	28 R2

NET SALVAGE

The present net salvage parameters range from negative 10 to negative

15 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 39 and negative 17 percent respectively. Removal cost in 2015-2020 was larger than in prior periods. The moving average in 2014 for the 5-year and 10-year periods is negative 9 and negative 10 percent respectively. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to a consistent negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

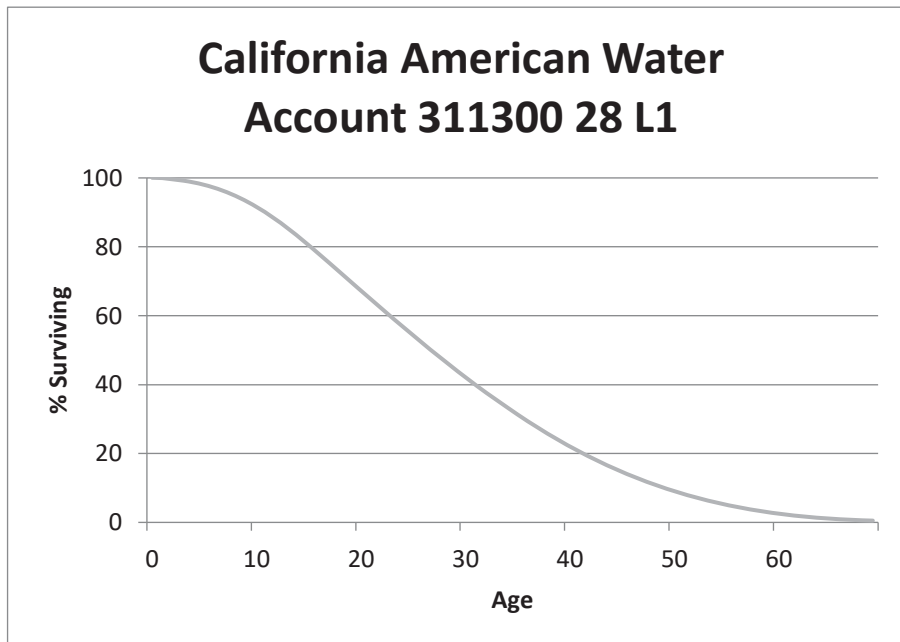
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Coronado	-15%	-10%
Larkfield	-15%	-10%
Los Angeles	-10%	-10%
Monterey Water	-15%	-10%
Sacramento	-15%	-10%
Ventura County	-15%	-10%

WATER Account 311300 Pumping Equipment Diesel

This account consists of pumping equipment driven by diesel power.

LIFE ANALYSIS

The account balance is \$63 thousand for this account. Since there is insufficient data exists to analyze this account, this study recommends the same life as is proposed for Account 311200. Based on the recommendation for Account 311200, this study recommends a 28-year life with an L1 dispersion which is shown below.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Monterey Water	\$62,926	29 L1	28 L1

NET SALVAGE

The present net salvage parameter is negative 15 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 39 and negative 17 percent respectively. The overall moving average in the most recent transaction year is negative 18. The transaction activity is too sparse to be definitive. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 311200. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

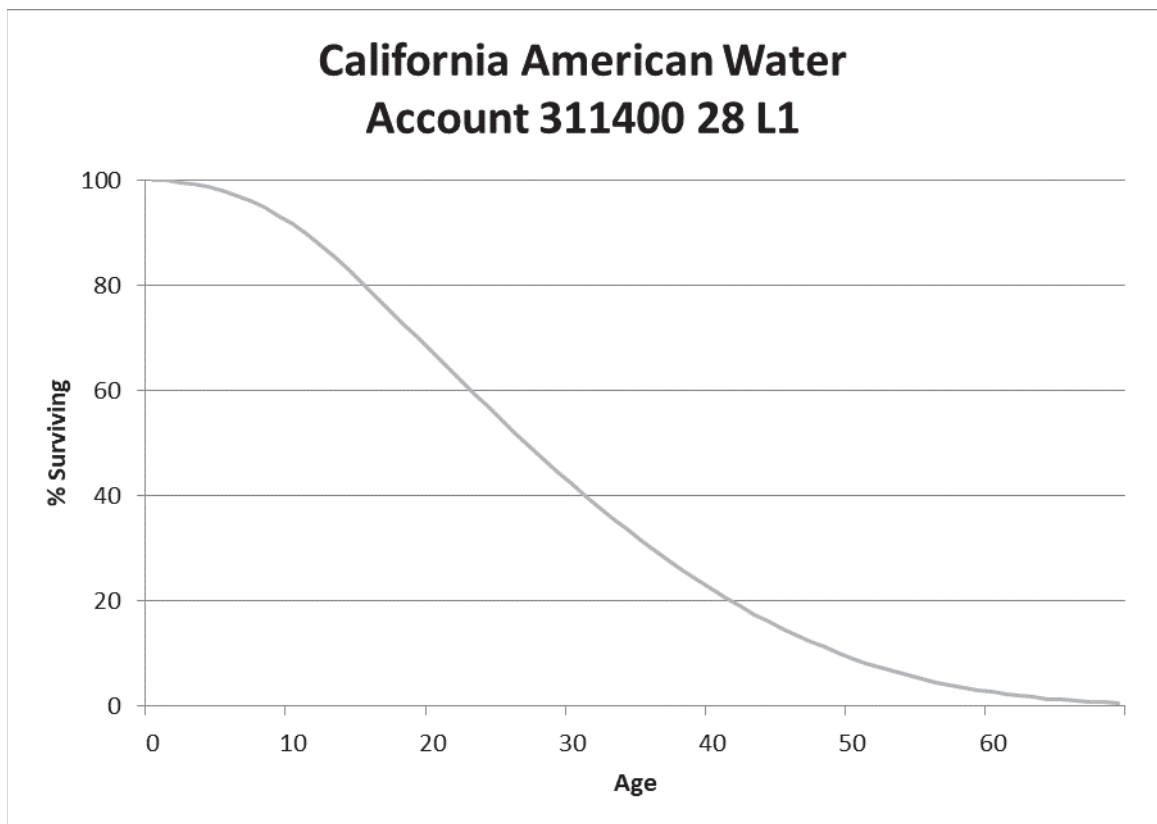
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Monterey Water	-15%	-10%

WATER Account 311400 Pumping Equipment Hydraulic

This account consists of pumping equipment driven by hydraulic power.

LIFE ANALYSIS

The plant balance in this account is \$1.4 million. There is limited retirement history available. Since there is insufficient data exists to analyze this account, this study recommends the same life as is proposed for Account 311200. Based on the recommendation for Account 311200, this study recommends a 28-year life with an L1 dispersion, which is shown below.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$1,842	28 S6	28 L1
Monterey Water	\$195,421	29 L1	28 L1
Sacramento	\$1,219,606	28 S6	28 L1
Ventura County	\$431	NA	28 L1

NET SALVAGE

The present net salvage parameter ranges from 0 to negative 15 percent. In the most recent transaction year, the 5-year and 10-year moving averages show negative 227 and negative 87 percent respectively. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 311200. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

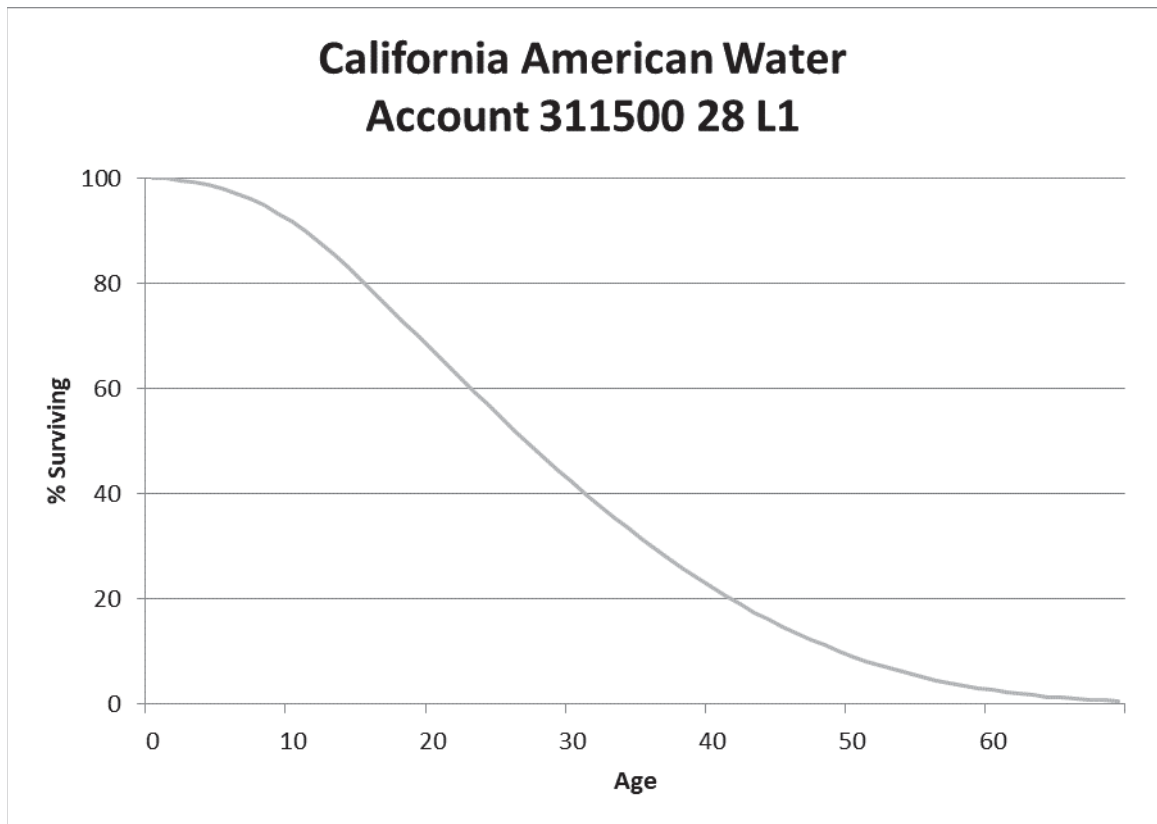
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-15%	-10%
Monterey Water	-15%	-10%
Sacramento	-15%	-10%
Ventura County	0%	-10%

WATER Account 311500 Pumping Equipment Other

This account consists of other pumping equipment.

LIFE ANALYSIS

The balance in this account is \$1.1 million. There is limited retirement history available. Since there is insufficient data exists to analyze this account, this study recommends the same life as is proposed for Account 311200. Based on the recommendation for Account 311200, this study recommends a 28-year life with an L1 dispersion, which is shown below.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Sacramento	\$1,138,298	28 S6	28 L1

NET SALVAGE

The present net salvage parameter is negative 15 percent. In the most recent transaction year, the overall moving average is negative 24 percent. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 311200. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

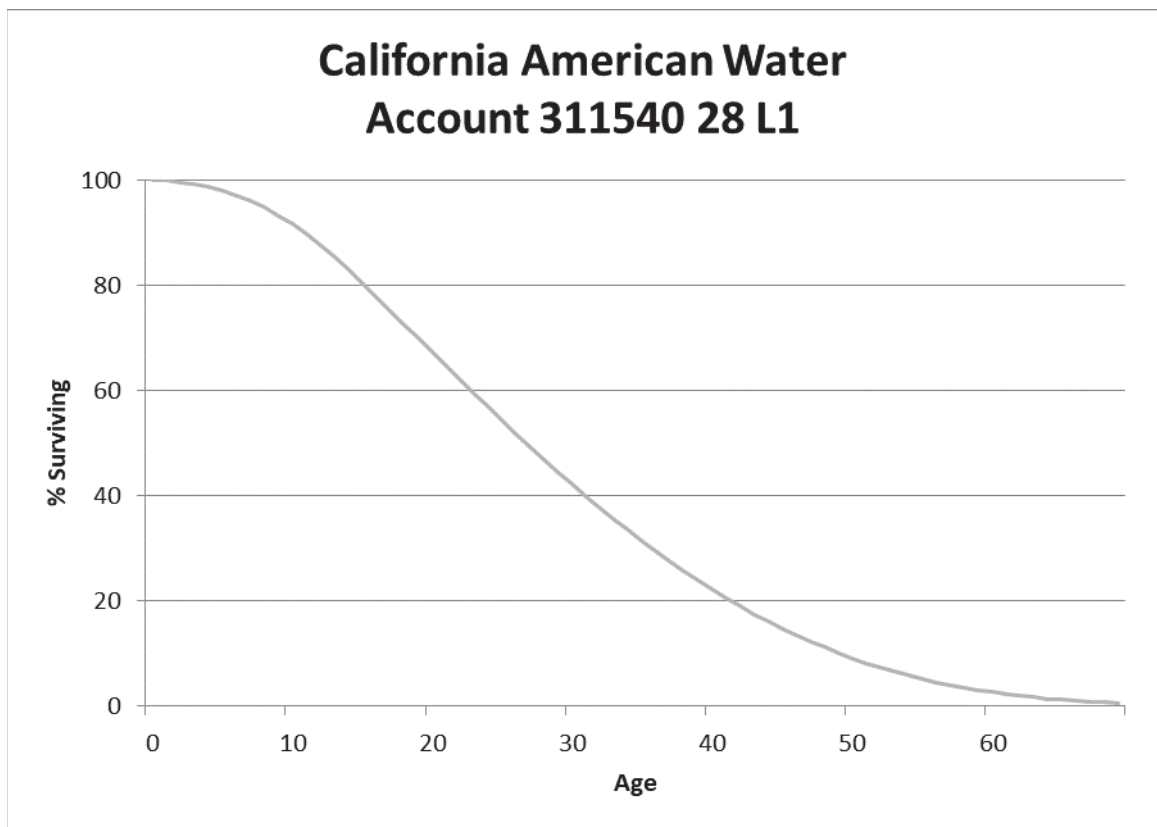
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Sacramento	-15%	-10%

WATER Account 311540 Pumping Equipment Transmission and Distribution

This account consists of pumping equipment for transmission and distribution operations.

LIFE ANALYSIS

The account balance is \$3.5 thousand for this account. One district has no life parameter, while the others show 22 and 29 years. There is no retirement history available. Based on the recommendation for Account 311200, this study recommends a 28-year life with an L1 dispersion, which is shown below.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$3,524	N/A	28 L1
Monterey Water	\$0	29 L1	28 L1
Sacramento	\$0	22 R1	28 L1

NET SALVAGE

The present net salvage parameter ranges from 0 to negative 15 percent. There is no retirement history for this account. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 311200. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to a consistent negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

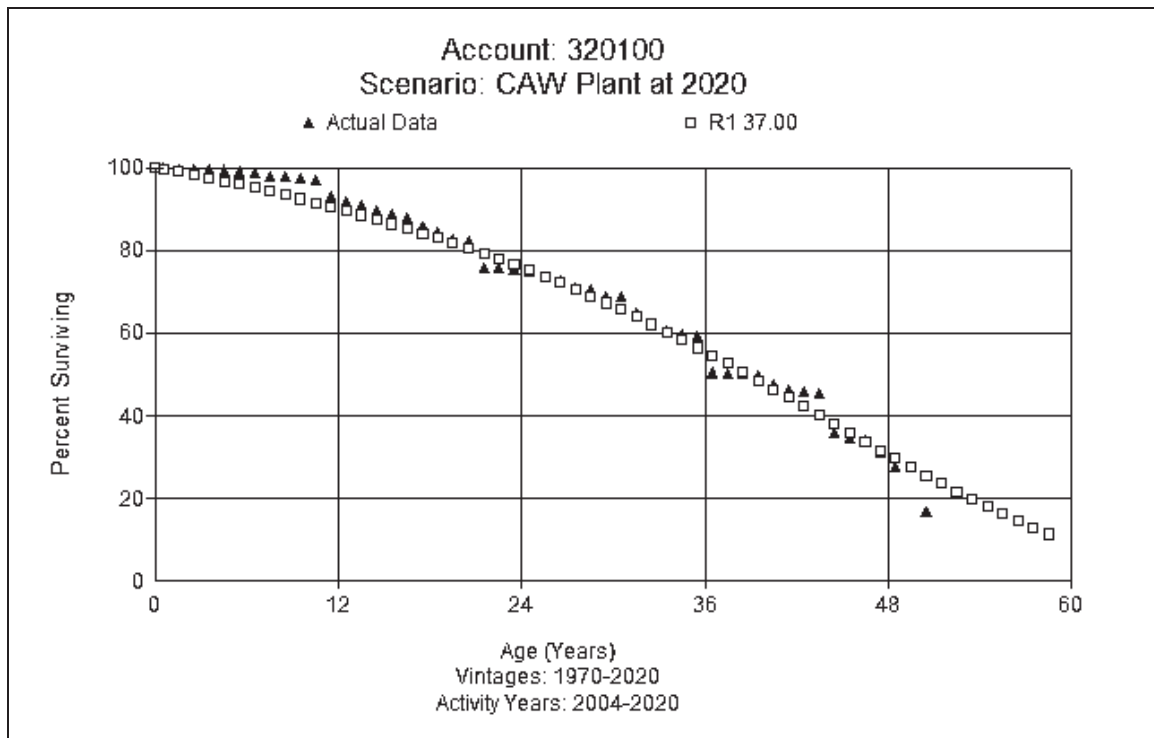
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Los Angeles	0%	-10%
Monterey Water	-15%	-10%
Sacramento	-15%	-10%

WATER Account 320100 WT Equipment Non-Media

This account consists of water treatment equipment excluding filtration systems.

LIFE ANALYSIS

The plant balance in this account is \$56.9 million. The current life ranges from 16 years to 43 years. Company SMEs report that various equipment in this account have different lives: pressure filters 60 years or longer; analyzers 2-5 years; chemical feed pumps 2-5 years; filter control valves 7-10 years; water level and control instrumentation 10 years; reclaim pumps 10-15 years; tanks 30-40 years for poly tanks; open concrete basins 50 years; and metal tanks 50-65 years. Overall, Company personnel believe an operational life around 40 years is a good proxy for the mix of short- and long-lived assets. Depending on the district, replacement activity occurs on a regular basis. After performing actuarial analysis on this account, a good visual fit can be found with a 37-year life and R1 dispersion, which is shown below.



Based on actuarial analysis, input from Company SMEs and judgment, this study recommends a 37-year life with an R1 dispersion. A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$16,324	16 S4	37 R1
Larkfield	\$1,610,838	42 R2	37 R1
Los Angeles	\$2,336,664	43 S3	37 R1
Monterey Water	\$20,818,681	42 R2	37 R1
Sacramento	\$32,030,608	42 R2	37 R1
Ventura County	\$97,686	42 R2	37 R1

NET SALVAGE

The present net salvage parameter is range from 0 to negative 25 percent. In the most recent transaction year, the 5-year and 10-year moving averages are

negative 30 and negative 15 percent. Large removal cost in years 2017-2019 may be producing abnormal results. In looking at the moving average in transaction year 2016, the 5 and 10 year moving averages show negative 10 and negative 9 per cent respectively. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Coronado	0%	-10%
Larkfield	-15%	-10%
Los Angeles	-15%	-10%
Monterey Water	-15%	-10%
Sacramento	-25%	-10%
Ventura County	-15%	-10%

WATER Account 320190 WT Equipment -Basin Clearwell

This account consists of the media for water treatment equipment including basins and clear well.

LIFE ANALYSIS

The plant balance in this account is \$158. There have been no retirements in this account. The current life is 43 years. Given the harsh environment in water treatment, that life seems too long. Based on input from Company personnel, this study recommends a 5-year life with an SQ dispersion. No curve is shown.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$158	43 S3	5 SQ

NET SALVAGE

The present net salvage parameter is negative 15 percent. There is no retirement history for this account. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 3201000. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Los Angeles	-15%	-10%

WATER Account 320193 WT Equipment -Chemical Feed

This account consists of the media for water treatment equipment using chemical feeds.

LIFE ANALYSIS

The plant balance in this account is \$2.6 million. There have been no retirements in this account, and this is a relatively new account. The current life is 43 years. Given the harsh environment in water treatment, that life seems too long. Based on input from Company personnel, this study recommends a 5-year life with an SQ dispersion. No curve is shown.

A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$108	43 S3	5 SQ
Sacramento	\$2,627,526	43 S3	5 SQ

NET SALVAGE

The present net salvage parameter is 15 percent. There is no retirement history for this account. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 3201000. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

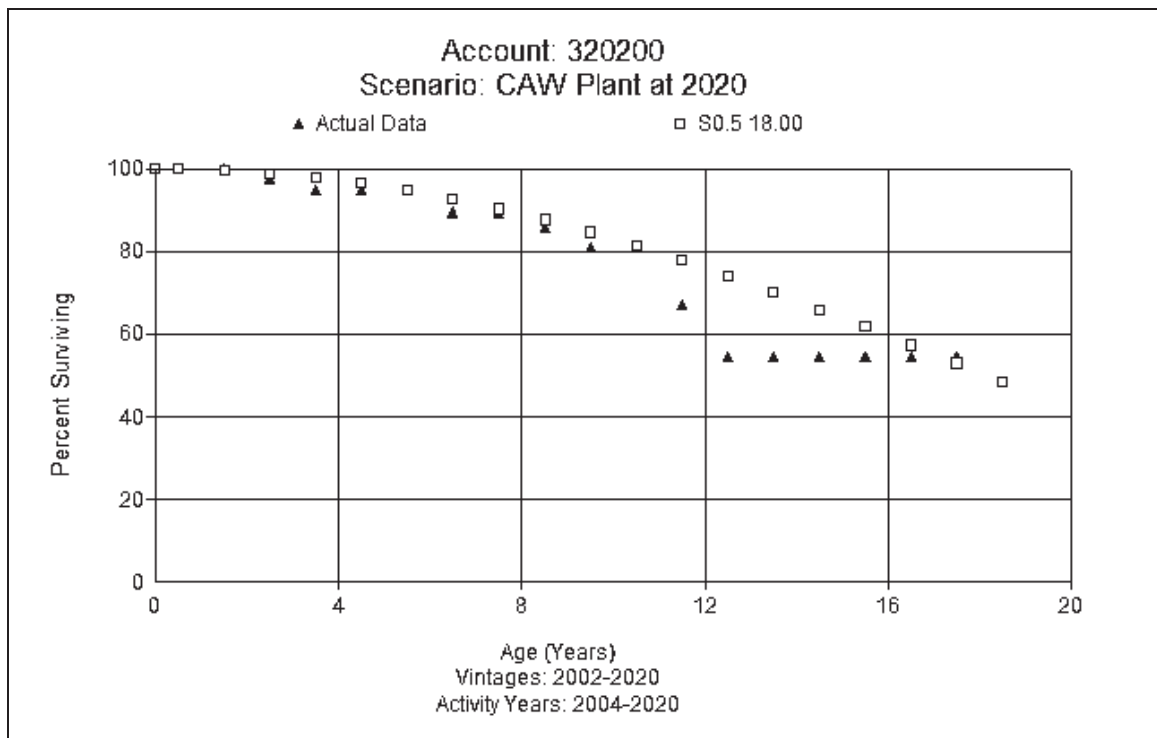
District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Los Angeles	-15%	-10%
Sacramento	-15%	-10%

WATER Account 320200 WT Equipment Filter Media

This account consists of the media for water treatment equipment including filtration systems.

LIFE ANALYSIS

The balance in this account is \$2.4 million. The current life for this account is 10 years. After performing actuarial analysis on this account, a slightly longer life is indicated. A visual match of an 18-year life with an S0.5 curve matches the data well and is shown below.



Based on actuarial analysis and judgment, this study recommends an 18-year life with an S0.5 dispersion. A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$135,666	10 S4	18 S0.5
Monterey Water	\$539,160	10 R2	18 S0.5
Sacramento	\$1,675,292	10 R2	18 S0.5

NET SALVAGE

The present net salvage parameter ranges from negative 5 to negative 25 percent. The most recent transaction year shows negative 17 percent for the 5-year and 10-year periods. Until more data is available, this study recommends using the same net salvage parameter recommended for Account 3201000. Considering judgment, Company history, and knowledge of the assets in this account, this depreciation study recommends moving to a consistent negative 10 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage Percentage	Proposed Net Salvage Percentage
Larkfield	-5%	-10%
Monterey Water	-5%	-10%
Sacramento	-25%	-10%

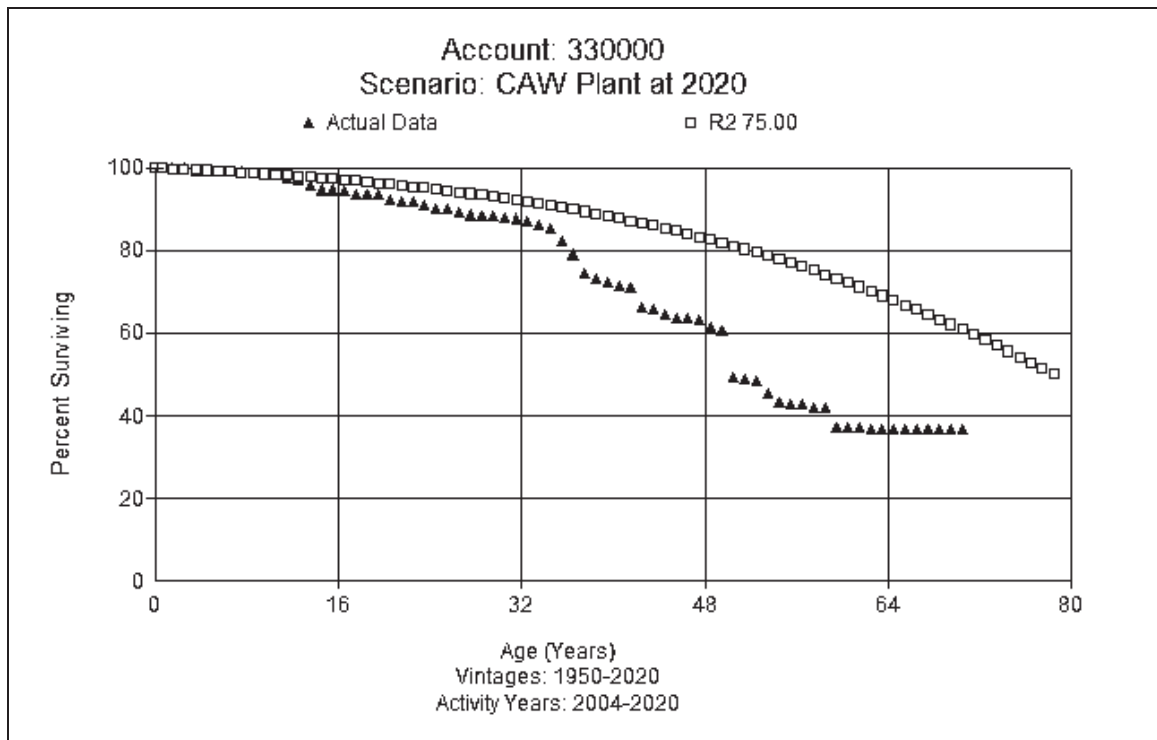
WATER Account 330000 Distribution Reservoirs and Standpipes

This account consists of reservoirs, tanks, standpipes, and appurtenances used in storing water for distribution.

LIFE ANALYSIS

The plant balance in this account is \$64.0 million. The existing life parameters range from 43 years to 74 years. Actuarial analysis shows some retirements in the 45-year range, but Company SMEs believe that a 45 year life is too short for these assets. Among reservoirs and ground level tanks, two reservoirs are out of service. The short life in the analytics is likely due to the rehab of the tanks, not the full life of the tank. A majority of the distribution tanks are metal. Of the metal tanks, most are welded tanks (which tend to last longer than panel tanks). Tanks may last 60-75 years with proper maintenance. Reservoirs should have around the same average life. There are around 100 tanks in the system. In the past several years, the Company did a lot of retrofitting on tanks, which may have skewed the analysis in the past compared to the steady state. There are no elevated tanks in Monterey. Earthquakes, foundations, and corrosion are issues for tanks. With proper maintenance and design, tanks should have a long life. Company SMEs believe that the current life is still reasonable for the tanks on the system, and the 30-year indications are too short.

Based on input from Company personnel and judgment, this study recommends a 75-year life with an R2 dispersion. A plot of the observed life table compared to the proposed Iowa Curve is shown below.



A table showing the plant balances and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$1,164,647	43 R5	75 R2
Larkfield	\$1,472,218	65 R4	75 R2
Los Angeles	\$10,101,867	74 R5	75 R2
Monterey Water	\$18,067,998	65 R4	75 R2
Sacramento	\$6,145,880	65 R4	75 R2
Ventura County	\$27,012,303	65 R4	75 R2

NET SALVAGE

The approved net salvage parameter is negative 15 percent for all districts. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the 5-year and 10-year moving

averages show negative 99 and negative 40 percent respectively. Large removal cost in 2019-2020 may be skewing the results. The moving average in transaction year 2018 shows negative 23 and negative 28 percent respectively. This study recommends one net salvage parameter for all districts. In order to move conservatively in the direction of a slightly higher negative net salvage, incorporating historical activity, and judgment, this depreciation study recommends negative 25 percent net salvage for this account. The parameters for each district are shown in the table below.

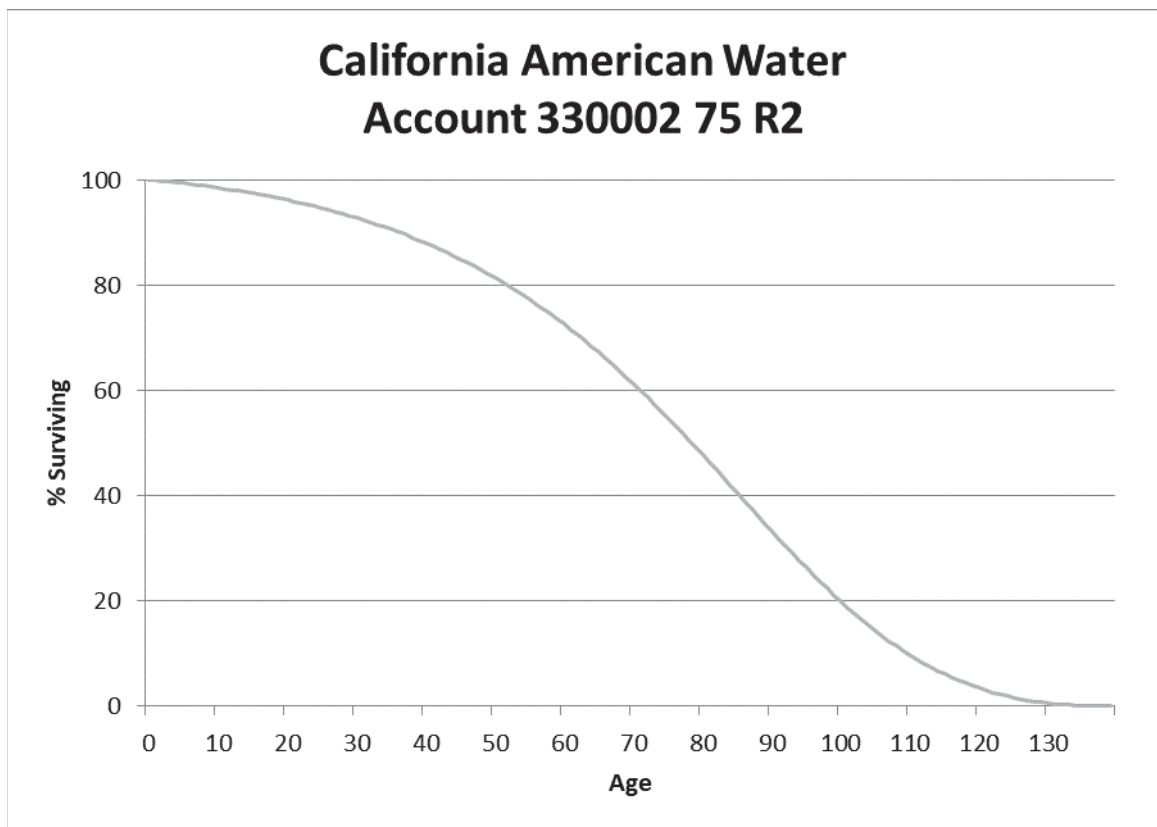
District	Approved Net Salvage	Proposed Net Salvage
Coronado	-15%	-25%
Larkfield	-15%	-25%
Los Angeles	-15%	-25%
Monterey Water	-15%	-25%
Sacramento	-15%	-25%
Ventura County	-15%	-25%
Ventura County	-15%	-25%

WATER Account 330002 Tank Original Painting

This account consists of tank original painting.

LIFE ANALYSIS

The plant balance in this account is \$24 thousand. There is no currently approved life characteristic for this account and no retirements have occurred. Based on judgment and the recommendation for Account 330000, this depreciation study recommends a 75 R2 dispersion curve for this account. A plot of a 75 R2 dispersion curve for this account is shown below.



A table showing the plant balance and life parameters by district is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Sacramento	\$24,606	N/A	75 R2

NET SALVAGE

The approved net salvage parameter is currently 0 percent. There has been no retirement activity in this account. To be consistent with the recommendation for the underlying assets in Account 330000, this study recommends negative 25 percent net salvage.

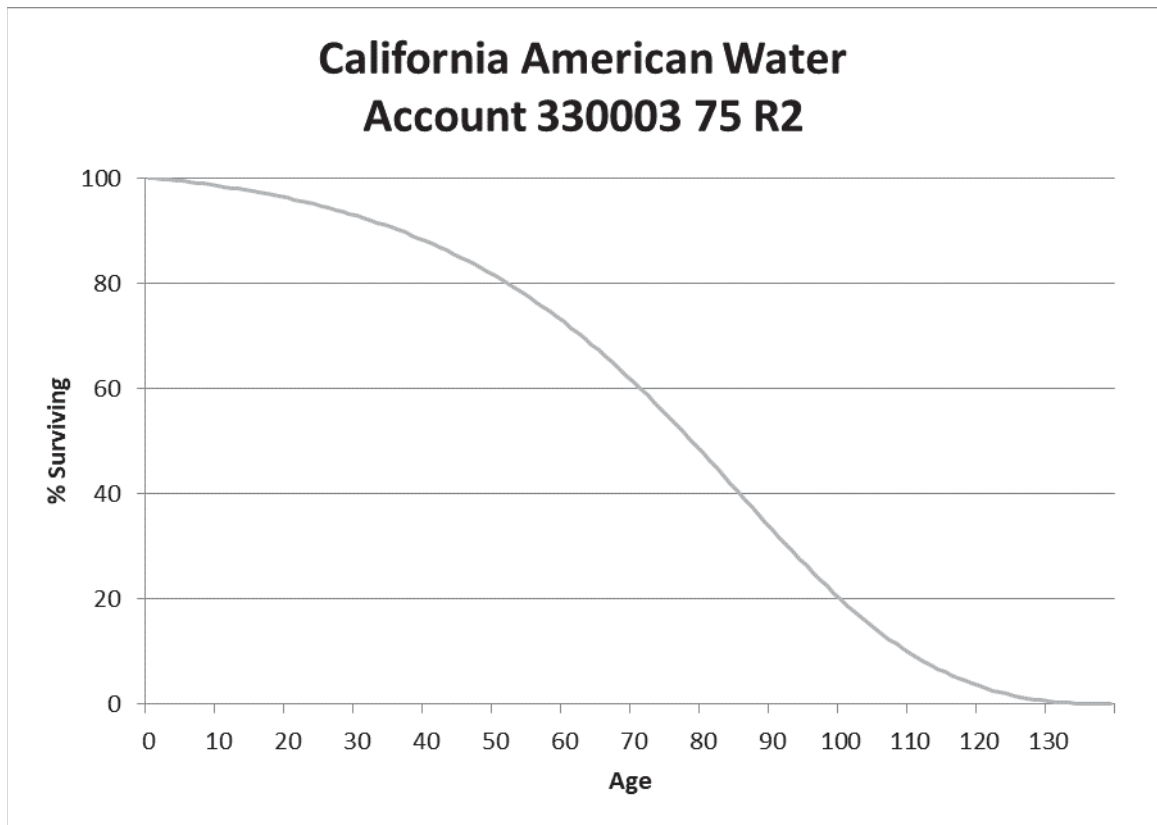
District	Approved Net Salvage	Proposed Net Salvage
Sacramento	0%	-25%

WATER Account 330003 Tank Repainting

This account consists of tank repainting.

LIFE ANALYSIS

The account balance is \$609 thousand for this account. There is no currently approved life characteristic for this account and no retirements have occurred. To be consistent with the recommendation for the underlying assets in Account 330000, this depreciation study recommends a 75 R2 dispersion curve for this account. A plot of a 75 R2 dispersion curve for this account is shown below.



A table showing the plant balance and life parameters by district is shown below.

District	Plant Balance	Approved Life	Proposed Life
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		Characteristic	Characteristic
Sacramento	\$609,461	N/A	75 R2

NET SALVAGE

The approved net salvage parameter is currently 0 percent. There has been no retirement activity in this account. To be consistent with the recommendation for Account 330000, this study recommends negative 25 percent net salvage.

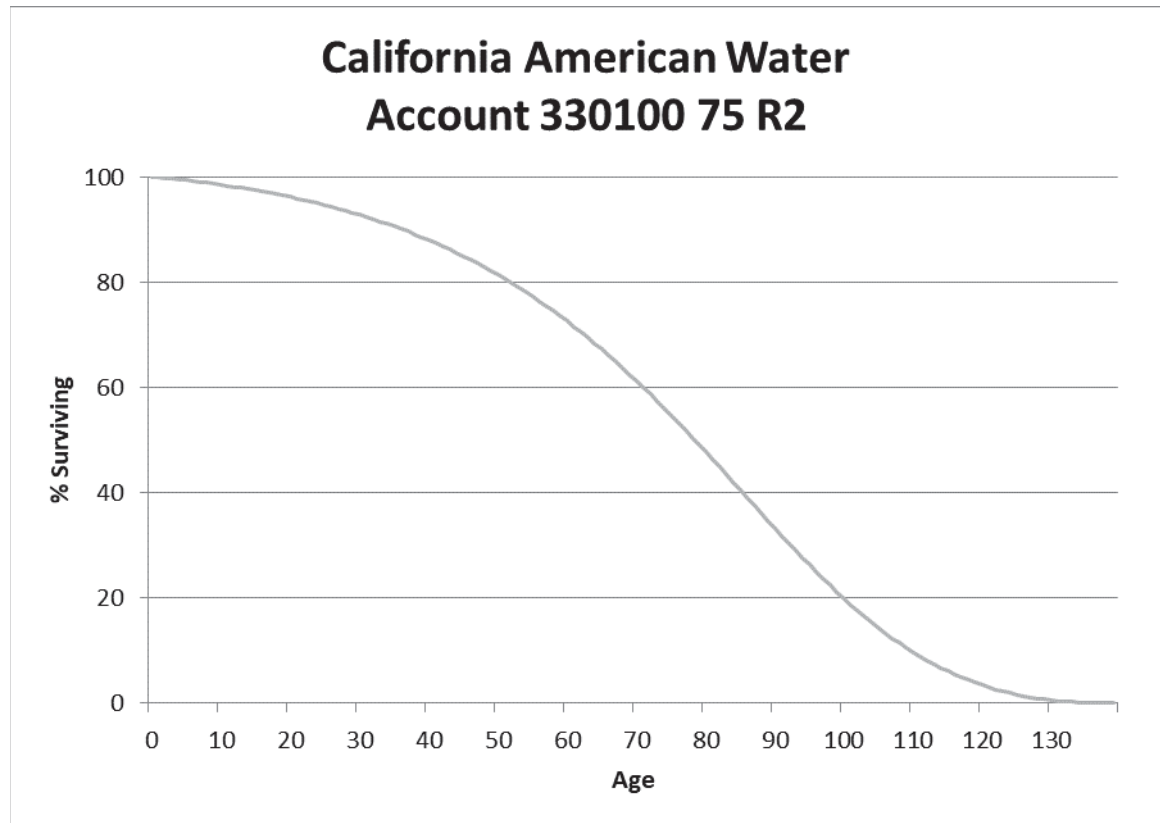
District	Approved Net Salvage	Proposed Net Salvage
Sacramento	0%	-25%

WATER Account 330100 Elevated Tanks and Standpipes

This account consists of elevated tanks and standpipes used in storing water for distribution.

LIFE ANALYSIS

The account balance is \$8 thousand for this account. The currently approved life characteristic is 41 R4. This account has only existed since 2003. Actuarial analysis shows a 13-year life, which is too short for this equipment. Based on judgment and the recommendation for Account 330000, this depreciation study recommends a 75 R2 dispersion curve for this account. A plot of a 75 R2 dispersion curve for this account is shown below.



A table showing the plant balance and life parameters by district is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$7,896	41 R4	75 R2

NET SALVAGE

The approved net salvage parameter is 0 percent. There has been no retirement activity in this account. Based in the recommendation for Account 330000, this study recommends negative 25 percent net salvage.

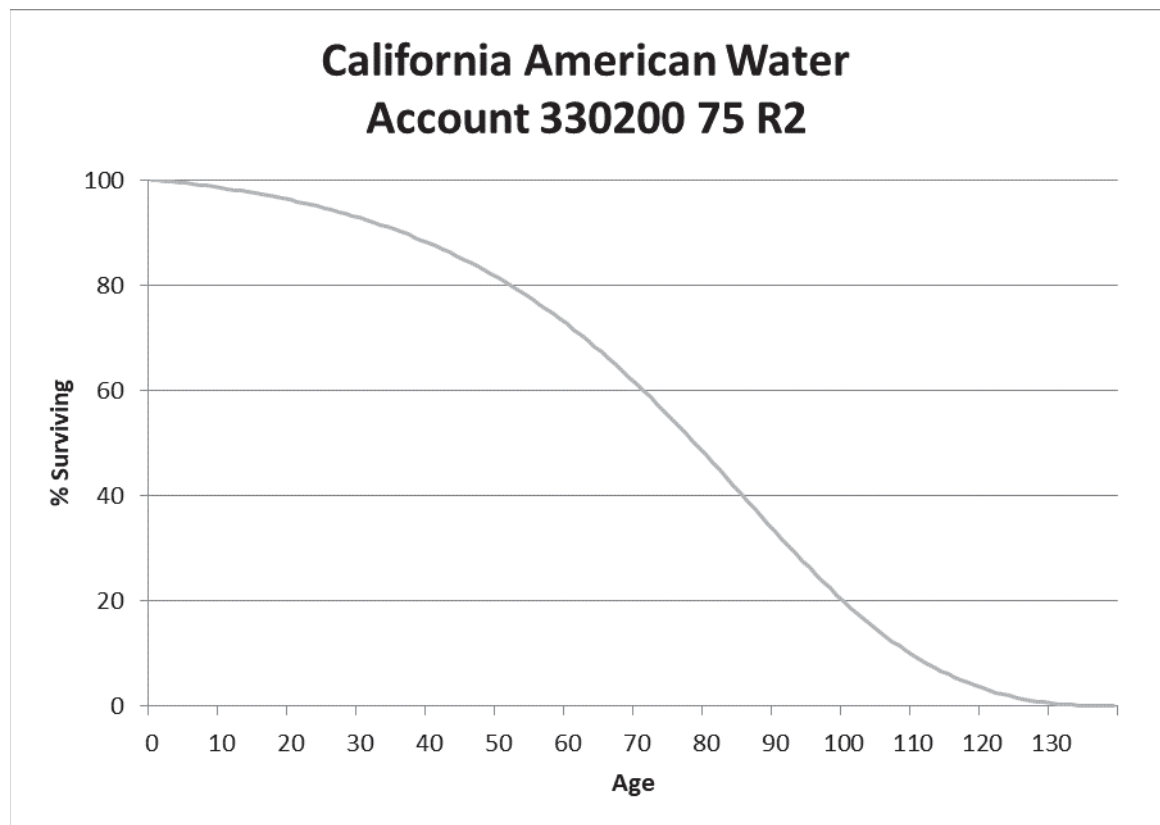
District	Approved Net Salvage	Proposed Net Salvage
Larkfield	0%	-25%

WATER Account 330200 Ground Level Facilities

This account consists of ground level tanks used in storing water for distribution.

LIFE ANALYSIS

The plant balance in this account is \$23 million. The currently approved life characteristic ranges from 41 to 46 years. Actuarial analysis shows a 49-year life, which is too short for this equipment. Based on judgment and the recommendation for Account 330000, this depreciation study recommends a 75 R2 dispersion curve for this account. A plot of a 75 R2 dispersion curve for this account is shown below.



A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$0	43 R5	75 R2
Larkfield	\$207,004	41 R4	75 R2
Monterey Water	\$8,629,286	41 R4	75 R2
Sacramento	\$13,039,379	41 R4	75 R2
Ventura County	\$1,112,647	46 S6	75 R2

NET SALVAGE

The approved net salvage parameter ranges from 0 to negative 15 percent. There has been no retirement activity in this account. Based in the recommendation for Account 330000, this study recommends negative 25 percent net salvage.

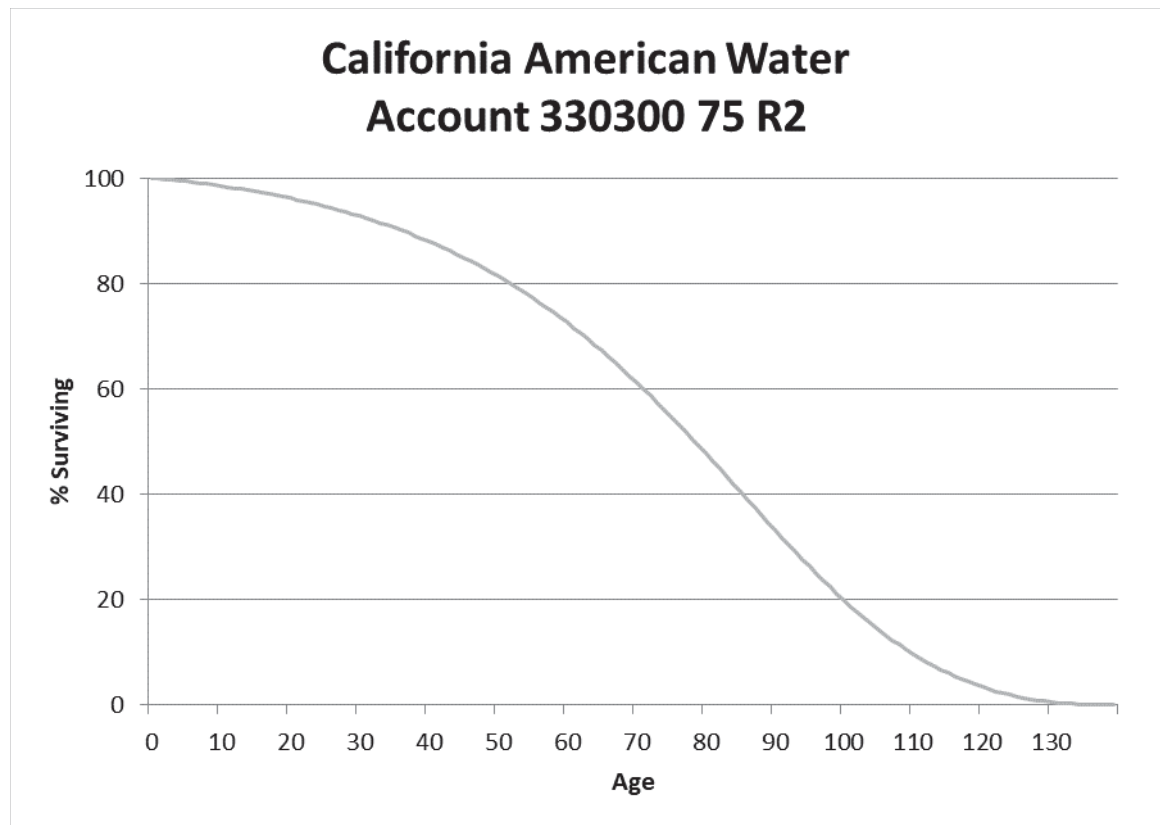
District	Approved Net Salvage	Proposed Net Salvage
Coronado	-15%	-25%
Larkfield	-15%	-25%
Monterey Water	0%	-25%
Sacramento	-15%	-25%
Ventura County	-15%	-25%

WATER Account 330300 Below Grade Facilities

This account consists of below grade facilities associated with ground level tanks used in storing water for distribution.

LIFE ANALYSIS

The plant balance in this account is \$133 thousand. The current life parameter is 41 years with an R4 dispersion. No retirements have occurred in this account over the historical period. Based on judgment and the recommendation for Account 330000, this depreciation study recommends a 75 R2 dispersion curve for this account. A plot of a 75 R2 dispersion curve for this account is shown below.



A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Sacramento	\$133.378	41 R4	75 R2

NET SALVAGE

The approved net salvage parameter is negative 15 percent. There has been no retirement activity in this account. Based in the recommendation for Account 330100, this study recommends negative 25 percent net salvage.

District	Approved Net Salvage	Proposed Net Salvage
Sacramento	-15%	-25%

WATER Account 331 Transmission and Distribution Mains

This account consists of transmission and distribution mains of varying material types and diameters.

LIFE ANALYSIS

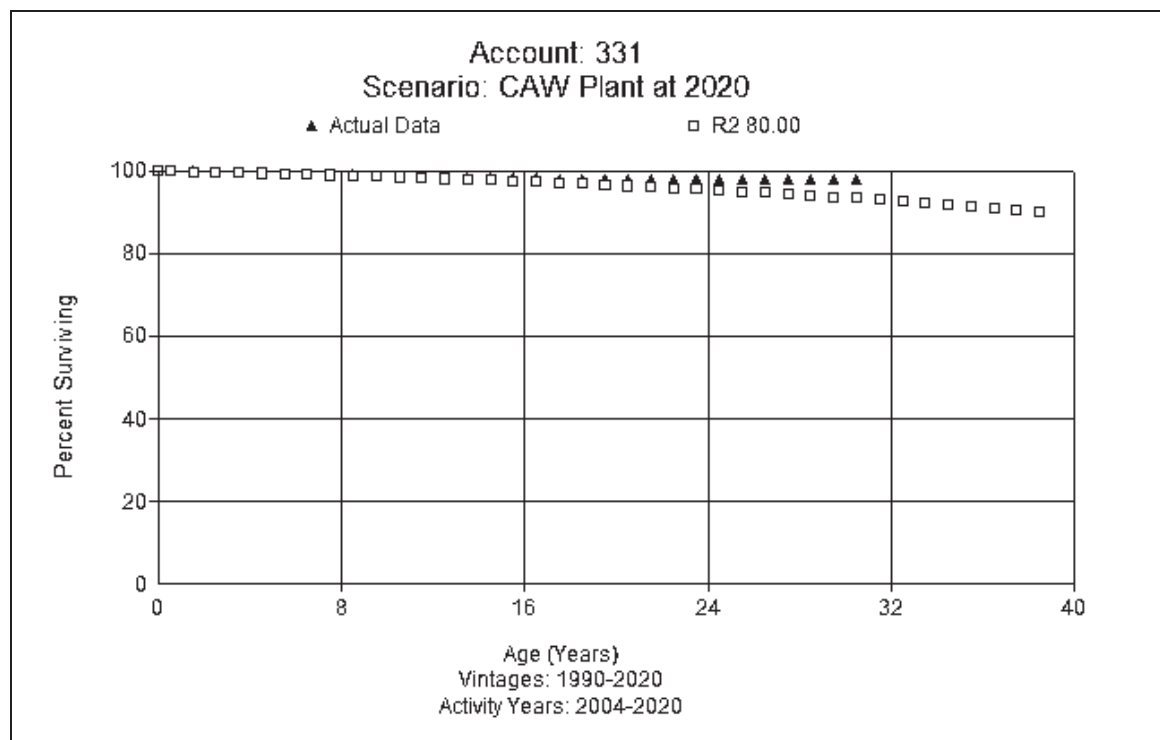
The balance in this account is \$413.5 million, which is approximately 40 percent of the depreciable plant for CAW at the study date. This account includes all sizes of mains: 331001- TD Mains Unclassified, 331100- TD Mains 4 inches and less, 331200- TD Mains 6 to 8 inches, 331300- TD Mains 10 to 16 inches, and 331400- TD Mains 18 inches and greater. In the last study, the parameter was determined by actuarial analysis and SPR analysis. SPR analysis was not utilized in this study since we did not have SPR data for all districts and because of the many additions in some districts that grew by acquisitions. In this study the small number of years where actuarial data is available (2004-2020) makes it difficult to analyze the life of this account.

Currently, all districts use a 75-year life. Company personnel believe an operational life in the high 70s or low 80s is a reasonable estimate for this account. Company SMEs report that in the Central Region the Monterey peninsula has not been growing “water wise” for a while, unlike LA. Fire flow is the only real reason to change capacity. They did install a large pipeline in recent years (36” for about 7 miles). They see no operational reason to see the life shorter than the currently approved life. A few hundred leaks per year for mains and services is not unusual. The Company will clamp or replace small sections of mains.

In the Southern region, the Company started condition-based assessments for mains around 2009-2010 and later (2012 and 2019). This effort began to stretch the lives of mains out. The expectation is that the lives will lengthen a little over time. In LA, there is more “redevelopment” than some of the other districts. In San Diego, there is more new development. In Ventura, there is more new development than LA. This may cause earlier replacement of

assets in certain classes of property in LA than in other districts. Every second GRC, the Company will target new condition-based assessments. They are not quite at the replacement rate in LA that they need to be, and this may be affecting the analytics.

After examining data from Company SMEs, this study focused a life in the 80-year range, which shows a slight increase for each district. The actuarial graph compared to an Iowa Curve is shown below



Based on input from Company SMEs, actuarial analysis, and judgment, this study recommends an 80-year life with an R2 dispersion for all accounts. A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$ 23,483,082	75 S3	80 R2
Larkfield	\$ 4,992,872	75 S3	80 R2
Los Angeles	\$ 56,609,453	75 L2	80 R2
Monterey Water	\$ 178,163,341	75 S6	80 R2
Sacramento	\$ 117,364,892	75 R3	80 R2
Ventura County	\$ 32,854,300	75 S6	80 R2

NET SALVAGE

The approved net salvage parameter varies by district, ranging from negative 30 to negative 70 percent. The composite negative net salvage using existing parameters for all districts based in 2020 plant balances is negative 51 percent. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the 5-year and 10-year moving averages show negative 486 and negative 344 percent respectively. As discussed in the gradualism section, the CPUC has been concerned about large increases in negative net salvage by utilities. This study recommends one net salvage parameter for all districts. In order to move conservatively in the direction of a slightly higher negative net salvage, incorporating historical activity, and judgment, this depreciation study recommends negative 60 percent net salvage for this account. The parameters for each district are shown in the table below.

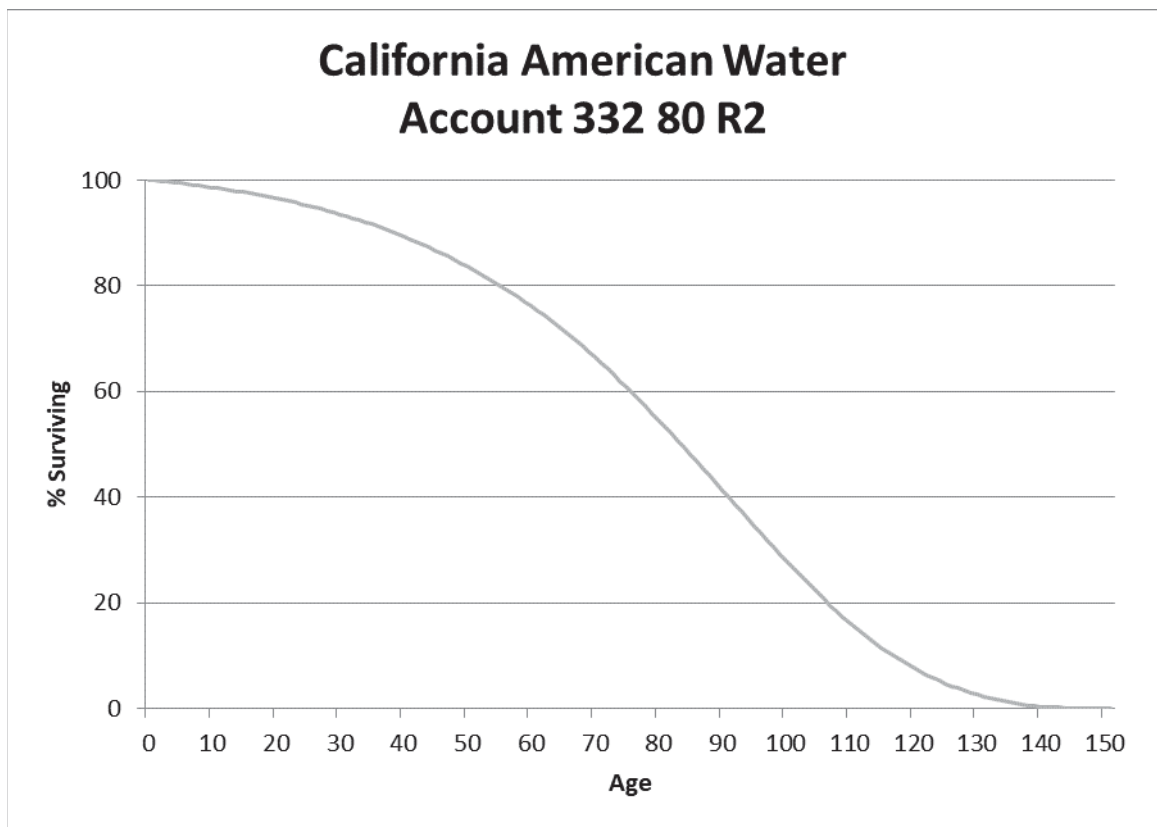
District	Approved Net Salvage	Proposed Net Salvage
Coronado	-30%	-60%
Larkfield	-35%	-60%
Los Angeles	-50%	-60%
Monterey Water	-70%	-60%
Sacramento	-30%	-60%
Ventura County	-30%	-60%

WATER Account 332000 Fire Mains

This account consists of fire mains.

LIFE ANALYSIS

There is \$151 thousand in this account. There have been no retirements recorded in this account over the available history. The assets in this account are similar to the items in Account 331, Transmission and Distribution Mains. Based on judgment and similarities in assets, this study recommends an 80-year life with an R2 dispersion. A generic curve shape is shown below.



The table below shows the various plant amounts and life parameters by district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$17,961	75 S3	80 R2
Sacramento	\$20,425	75 R3	80 R2
Ventura County	\$112,988	N/A	80 R2

NET SALVAGE

The approved net salvage parameter varies from 0 percent to negative 30 percent. There has been no retirement activity over the historical period. Given the similarity between this account and Account 331, this depreciation study recommends negative 60 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Larkfield	-35%	-60%
Sacramento	-30%	-60%
Ventura County	0%	-60%

WATER Account 333000 Services

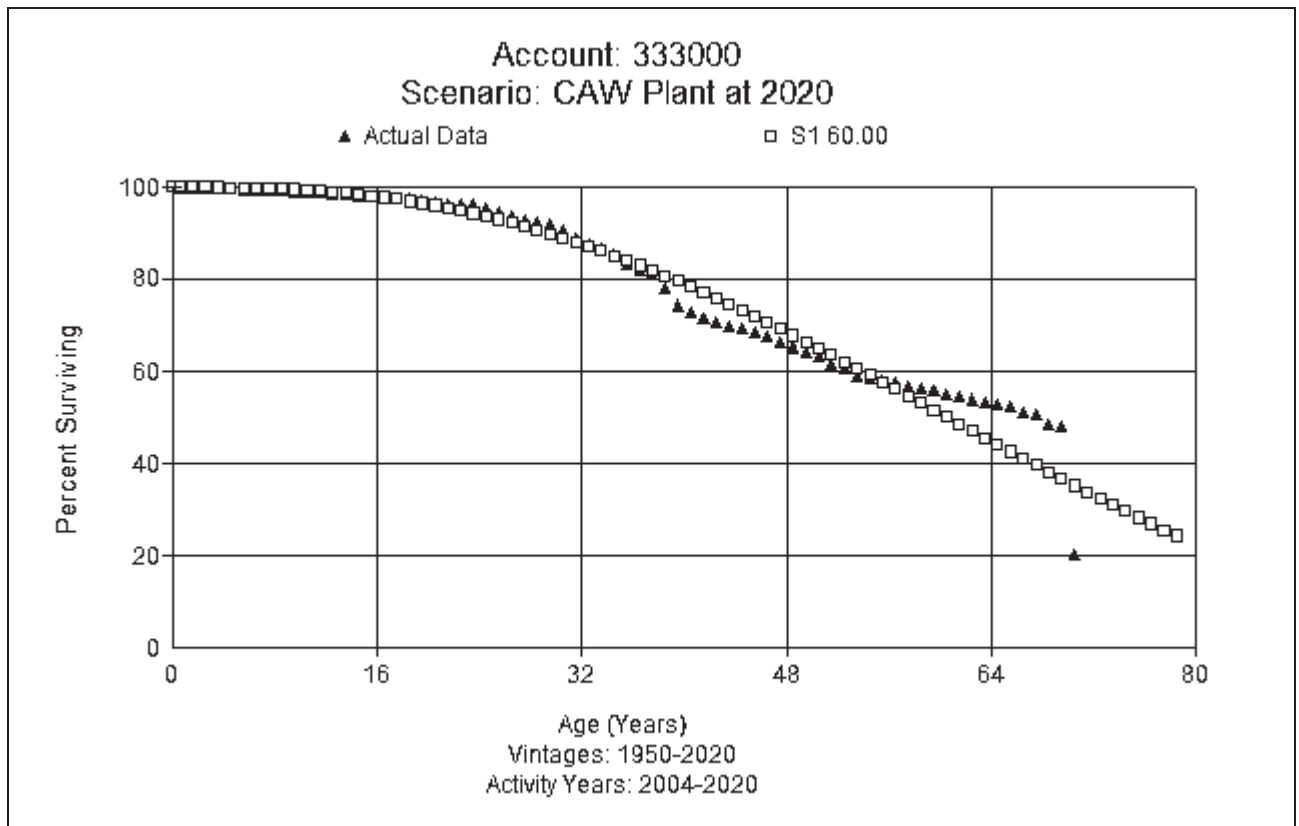
This account consists of service pipes and accessories leading from the main to the customers' premises.

LIFE ANALYSIS

There is \$137.9 million in plant. This is the second largest account by investment in this depreciation study. The current life parameters range from 43 years to 60 years. Company SMEs believe that the operational life of services is shorter than mains, which is recommended at 80 years. There are more failures and leaks at connection points. Company experts believe that an operational life of 50 to 60 years would be accurate. The historic drought has affected services, particularly in the Southern region. Ventura County has different soil conditions and more plastic pipe, with corresponding higher leak and break rates, which created shorter life expectations. Even copper mains in Ventura County are impacted by the corrosive soil. In the Central and Northern regions, the Company is only replacing services as needed and try to renew if there is a leak.

In the Central region, there are a little over 40k services, and this number will be relatively static. Only "lots of record" are allowed to have new services (a few dozen total) if they comply with other regulations. There are a fair number of galvanized services that need to be replaced over time. All known Polybutylene services have been replaced (these had a very short life) and the Company has moved to Polyethylene. Forces of retirement are many: smaller pipe which endures higher velocity, the material type of the services, galvanic corrosion and brittleness of plastic, and dig-ins. Copper can have kinks, which causes leaks. Company personnel report that in the past year over 90% of service leaks will trigger replacement activity.

After examining various actuarial results, a 60-year life with an S1 dispersion curve provides a reasonable visual match, which is shown below.



Relying upon input from Company SMEs, actuarial analysis, and judgment, this study recommends a 60-year life with an S1 dispersion for all districts. A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$12,528,806	56 S5	60 S1
Larkfield	\$2,113,070	50 S3	60 S1
Los Angeles	\$32,398,804	50 R1	60 S1
Monterey Water	\$32,558,617	60 S3	60 S1
Sacramento	\$33,891,218	50 S3	60 S1
Ventura County	\$24,394,108	43 S6	60 S1

NET SALVAGE

The approved net salvage parameter is negative 50 percent. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the 5-year and 10-year moving averages show negative 220 and negative 272 percent respectively. As mentioned in the gradualism discussion, the CPUC has been concerned about overly-large increases in negative net salvage by utilities. Bearing in mind that guidance, historical activity, and judgment, this depreciation study recommends negative 75 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Coronado	-50%	-75%
Larkfield	-50%	-75%
Los Angeles	-50%	-75%
Monterey Water	-50%	-75%
Sacramento	-50%	-75%
Ventura County	-50%	-75%

WATER Account 334100 Meters

This account consists of meters, devices, and other appurtenances used for measuring the quantity of water delivered to users, whether actually in service or held in reserve. The life of meters is set by Commission order.

LIFE ANALYSIS

There is \$54.3 million in this account. Currently all districts use a 20-year life. Company SMEs state the Commission rules have a 20-year replacement rule. Ventura County may move to AMI meters in the next couple of years, but there are no definitive circumstances to a change in the current life. Based on Commission rule for change out, this study recommends retention of the current 20-year life with an SQ dispersion. No graph is shown.

A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$4,266,509	20 SQ	20 SQ
Larkfield	\$866,650	20 SQ	20 SQ
Los Angeles	\$9,106,804	20 SQ	20 SQ
Monterey Water	\$12,114,277	20 SQ	20 SQ
Sacramento	\$21,763,321	20 SQ	20 SQ
Ventura County	\$6,148,332	20 SQ	20 SQ

NET SALVAGE

The approved net salvage parameter is 0 percent for all districts. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the 5-year and 10-year moving averages show

negative 34 and negative 46 percent respectively. To reflect movement toward the Company's actual experience, this depreciation study recommends a conservative movement to a negative 20 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	-20%
Larkfield	0%	-20%
Los Angeles	0%	-20%
Monterey Water	0%	-20%
Sacramento	0%	-20%
Ventura County	0%	-20%

WATER Account 334102 Meter Greater than 1”

This account consists of meters vault greater than 1 inch used for measuring the quantity of water delivered to users, whether actually in service or held in reserve.

LIFE ANALYSIS

The plant balance in this account is \$57 thousand. The current life for this account is 20 years. According to Company SMEs, larger meters are on a 15-year replacement cycle. Given Company practice, a 15-year life with an SQ dispersion is recommended for this account. No curve is shown.

A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$57,028	20 SQ	15 SQ

NET SALVAGE

The approved net salvage parameter is 0 percent. There has been no retirement activity over the historical period. Since this account is similar to Account 334100, this depreciation study recommends negative 20 percent net salvage for this account. The parameters for each district are shown in the table below.

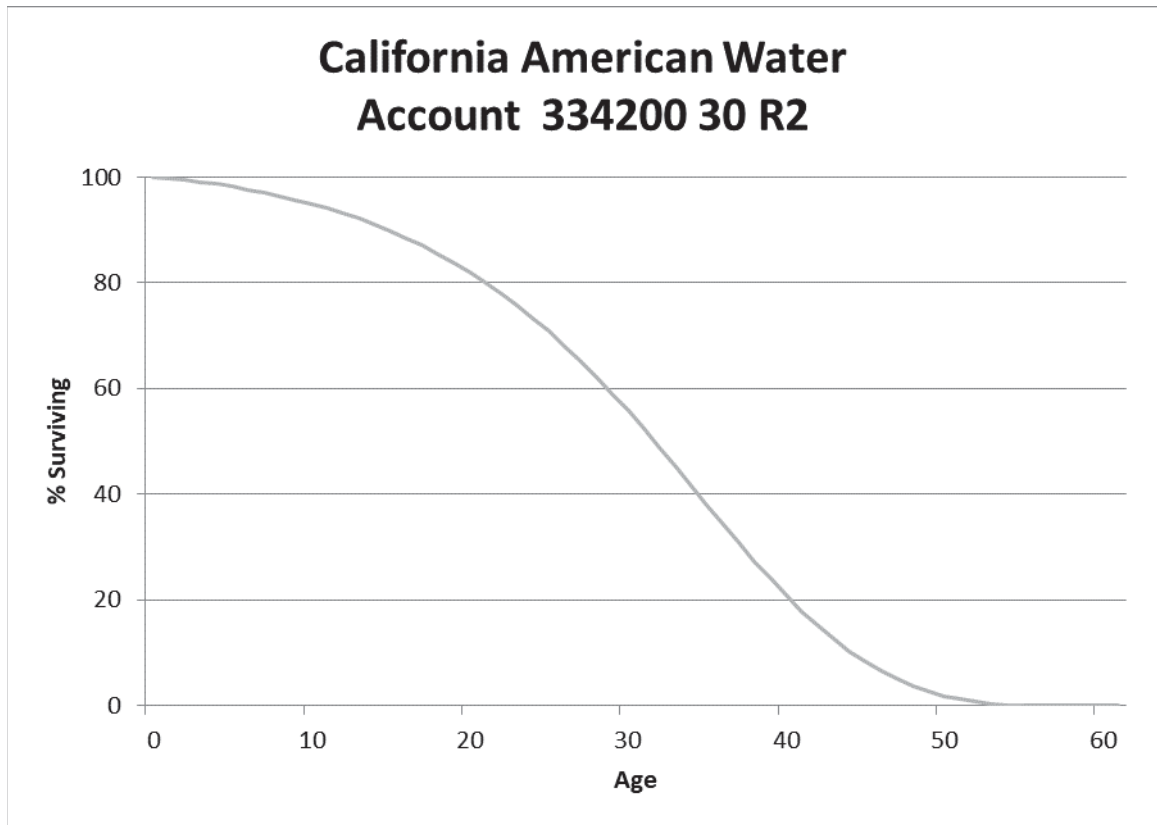
District	Approved Net Salvage	Proposed Net Salvage
Los Angeles	0%	-20%

WATER Account 334200 Meter Installation

This account consists of meter installations.

LIFE ANALYSIS

The plant balance in this account is \$1.2 million. Two districts have no existing parameter and two districts have 20 years as the existing life parameter. This account has limited data for actuarial analysis. In Alliance's experience, installations last longer than the meter. Based on judgment, this study recommends a 30-year life with an R2 dispersion. A generic curve shape is shown below.



A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$196	20 SQ	30 R2
Los Angeles	\$456,575	20 SQ	30 R2
Sacramento	\$33.484	20 SQ	30 R2
Ventura County	\$730,223	N/A	30 R2

NET SALVAGE

The approved net salvage parameter is 0 percent for two districts and there is no parameter for two districts. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the 5-year and 10-year moving averages show negative 122 and negative 78 percent respectively. To reflect movement toward the Company's actual experience, , this depreciation study recommends a conservative movement to a negative 10 percent net salvage for this account. The parameters for each district are shown in the table below.

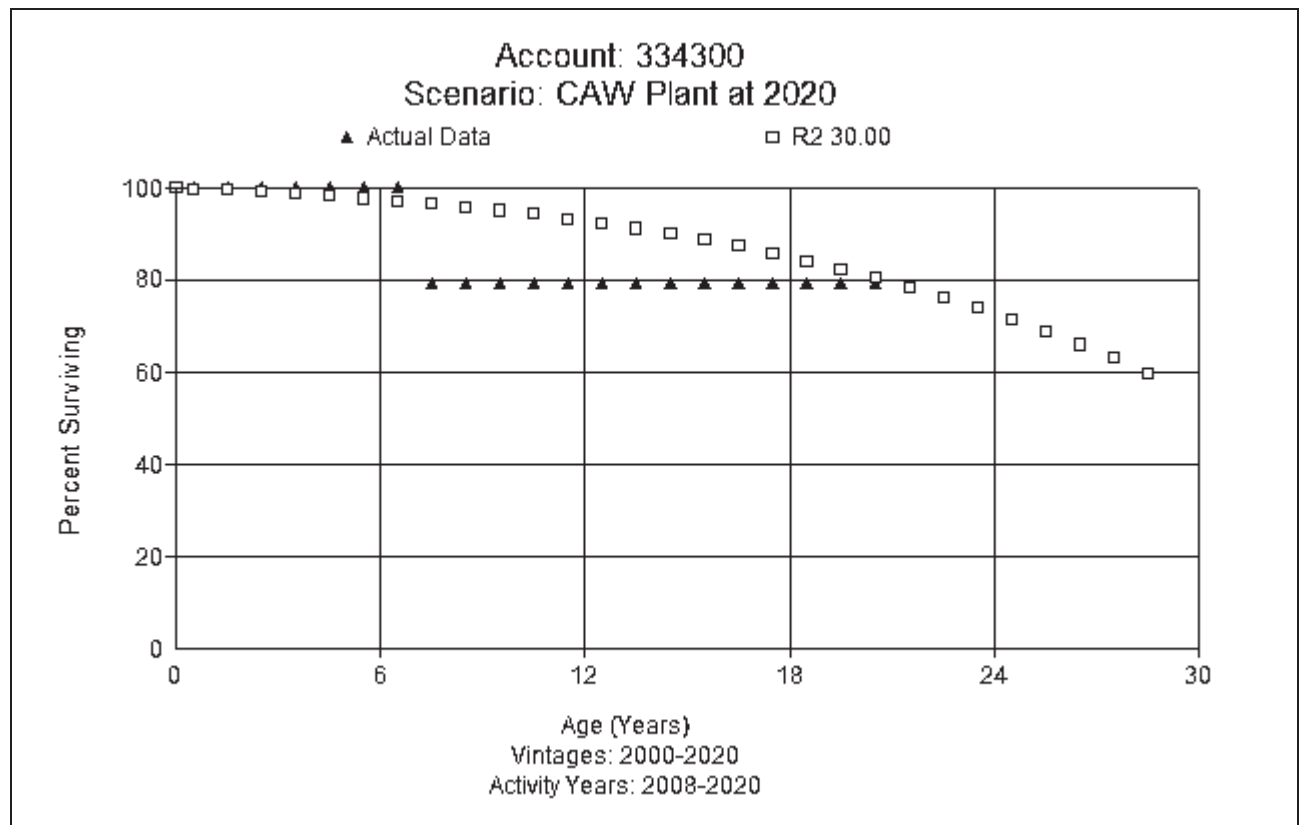
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	-10%
Los Angeles	0%	-10%
Sacramento	0%	-10%
Ventura County	N/A	-10%

WATER Account 334300 Meter Vaults

This account consists of meters vaults used for measuring the quantity of water delivered to users, whether actually in service or held in reserve.

LIFE ANALYSIS

The plant balance in this account is \$948 thousand. The current life parameters are unknown in two districts and 40 years in a third. Company SMEs report that these assets include turnouts. The actuarial data is sparse, but a 40-year life seems longer than indicated by current analysis. A graph comparing the observed life table to a 30-year life with an R2 dispersion is shown below.



Based on the limited actuarial analysis and judgment, this study recommends a 30-year life with an R2 dispersion for this account.

A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$205,315	N/A	30 R2
Los Angeles	\$8,643	N/A	30 R2
Monterey Water	\$734,401	40 R2	30 R2

NET SALVAGE

The approved net salvage parameter is 0 percent for one district and there is no parameter for two districts. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the overall moving average shows negative 158 percent. To move in the direction of the historical activity, this depreciation study recommends negative 10 percent net salvage for this account. The parameters for each district are shown in the table below.

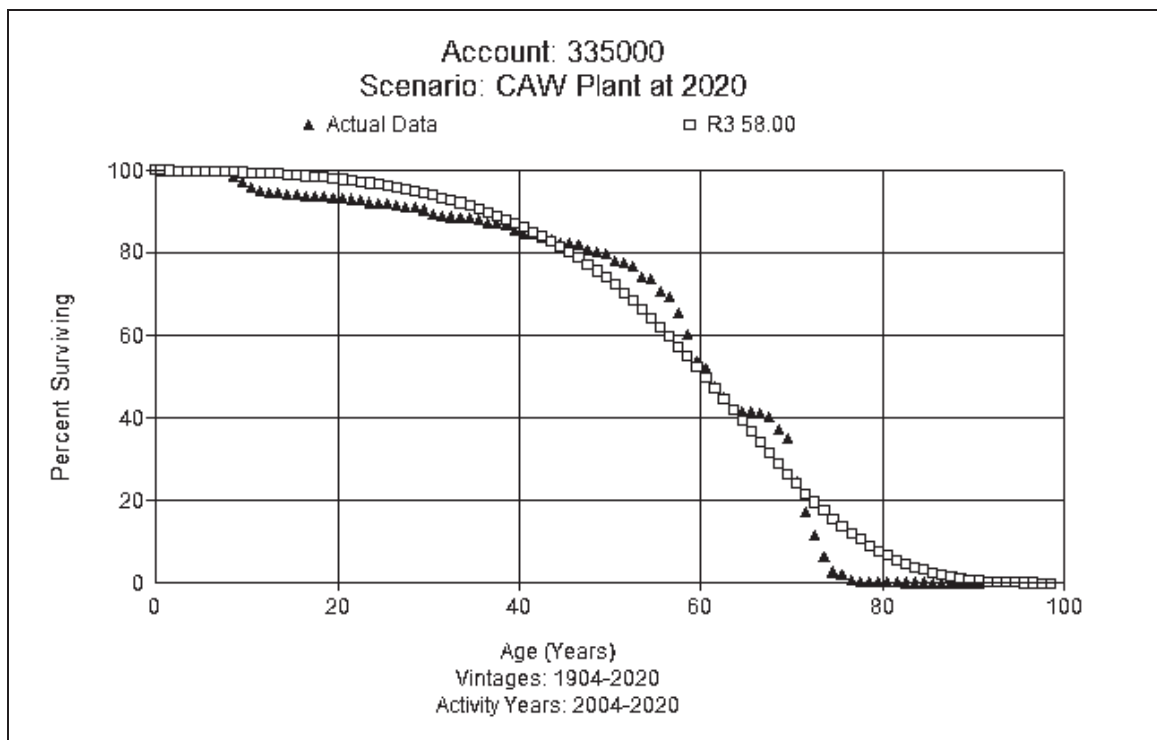
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	-10%
Los Angeles	0%	-10%
Monterey	0%	-10%

WATER Account 335000 Hydrants

This account consists of hydrants in service owned by the utility.

LIFE ANALYSIS

The balance in this account is \$34.1 million. The approved life characteristic for this account ranges from 45 to 55 years. Company SMEs report that they exercise 20% of hydrants every year. Hydrant replacement sometimes coincides with Fire Department testing or other factors such as damage from vehicles. The Company replaces older hydrants (which have smaller diameter opening) with newer, larger diameter hydrants. Company SMEs do not see any operational reason for the life to extend much beyond the current level. Hydrants are examined in condition-based assessment for hydrants and replaced with main replacement projects. After examining various actuarial results, a 58-year life with an R3 dispersion is a good visual match. A plot comparing observed life table to a 58-year life with an R3 dispersion is shown below.



Based on actuarial results, input from Company SMEs, and judgment, this study recommends a 58-year life with an R3 dispersion for this account.

A table showing the plant balances by district and life parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$1,718,774	53 R4	58 R3
Larkfield	\$612,421	55 R4	58 R3
Los Angeles	\$5,661,569	52 R1	58 R3
Monterey Water	\$10,136,997	55 S3	58 R3
Sacramento	\$11,828,694	55 R3	58 R3
Ventura County	\$4,149,038	45 S6	58 R3

NET SALVAGE

The approved net salvage parameter is negative 30 percent. Since the last depreciation study, this account is showing greater negative net salvage. In the most recent period, the 5-year and 10-year moving averages show negative 86 and negative 96 percent respectively. Based on historical activity and judgment, this depreciation study recommends an incremental movement to a negative 55 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net	Proposed Net
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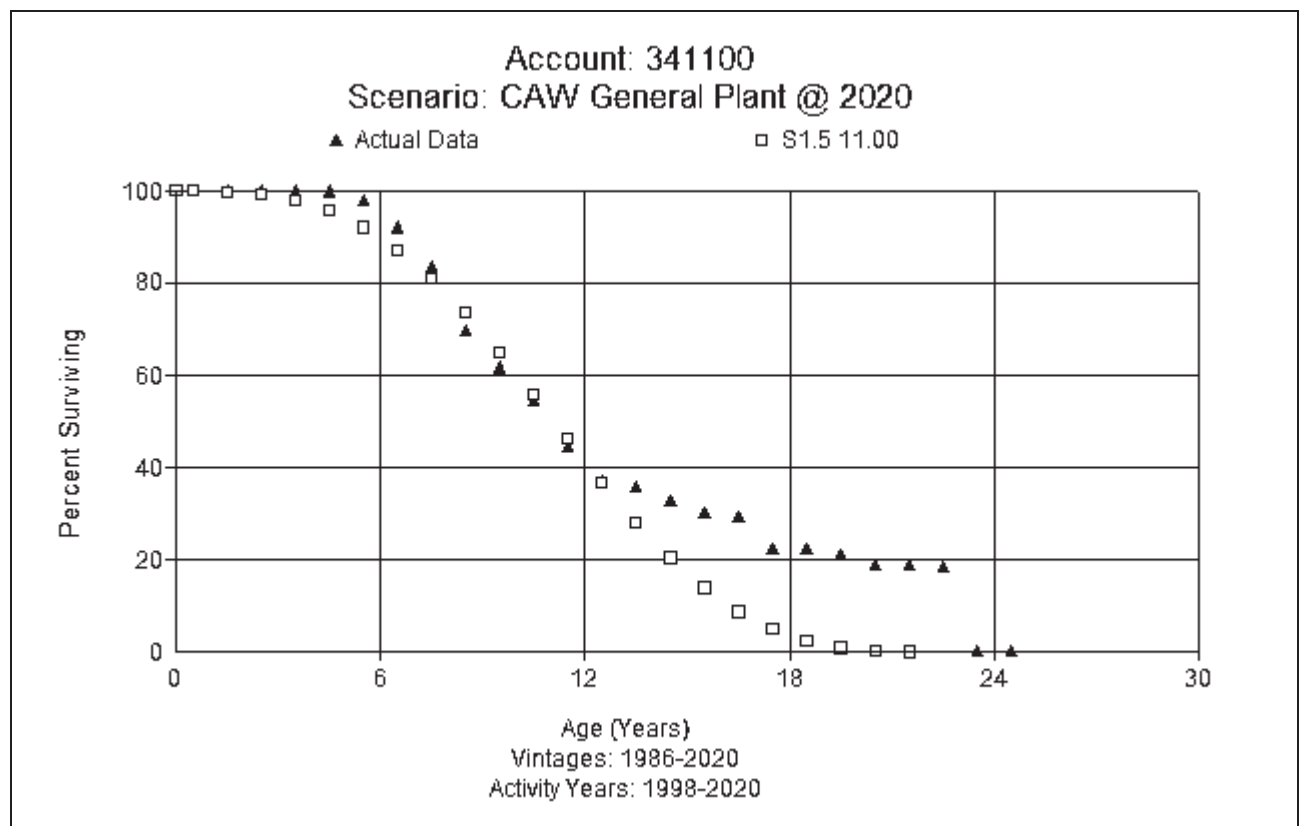
	Salvage	Salvage
Coronado	-30%	-55%
Larkfield	-30%	-55%
Los Angeles	-30%	-55%
Monterey Water	-30%	-55%
Sacramento	-30%	-55%
Ventura County	-30%	-55%

WATER Account 341100 Transportation Equipment Light Duty Trucks

This account consists of light duty trucks, such as a Ford Ranger or Ford F150.

LIFE ANALYSIS

The balance in this account is \$1.1 million. The approved life characteristics for this account are between 7 and 11 years. Based on judgment, the type of assets in this account, actuarial analysis, and knowledge of company operations, this depreciation study recommends an 11 S1.5 dispersion curve for this account. A graph of the proposed curve vs the observed life for this account is shown below.



Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$67,314	11 R1	11 S1.5
Los Angeles	\$26,483	11 R1	11 S1.5
Monterey Water	\$71,417	11 R1	11 S1.5
Sacramento	\$911,748	7 SQ	11 S1.5
Ventura County	\$57,271	11 R1	11 S1.5

NET SALVAGE

The approved net salvage for all districts is positive 10 percent. The 5-year and 10-year moving average in the most recent year shows 4 and positive 2 percent for both periods. There have been no retirements since 2019. This account usually shows higher net salvage than CAW is exhibiting. Based on industry experience and judgment, a positive 10 percent net salvage is recommended for this account. The parameters for each district are shown in the table below.

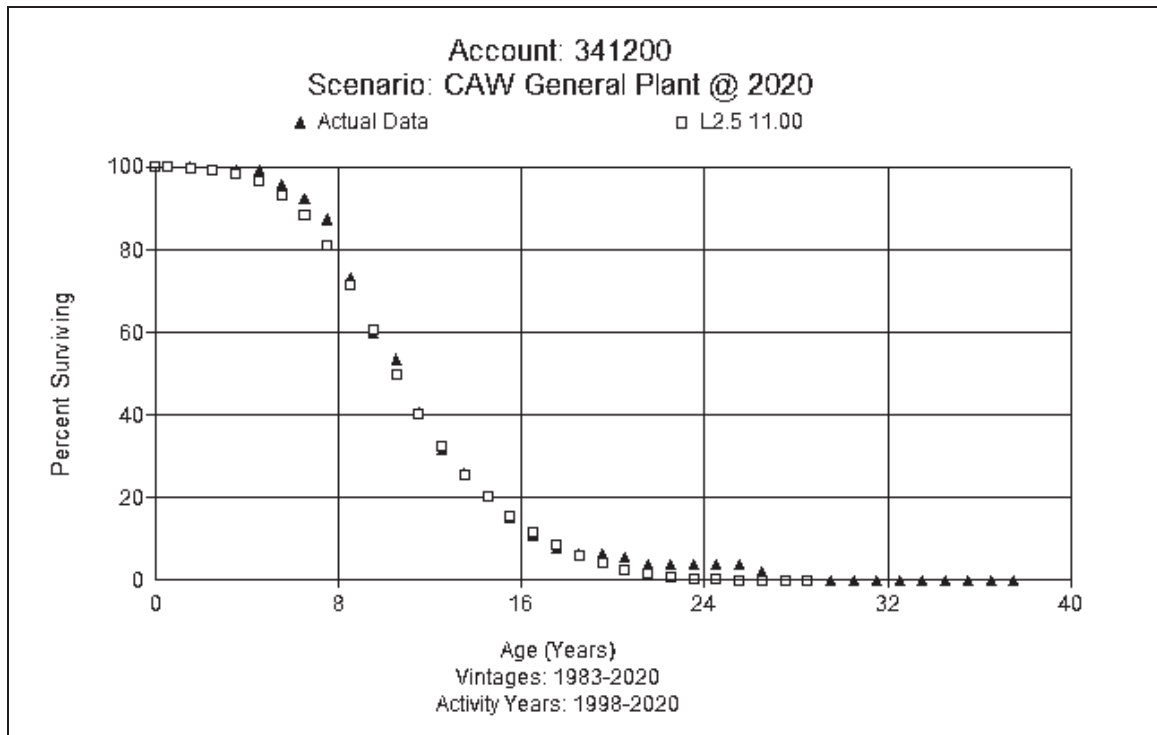
District	Approved Net Salvage	Proposed Net Salvage
Coronado	10%	10%
Los Angeles	10%	10%
Monterey Water	10%	10%
Sacramento	10%	10%
Ventura County	10%	10%

WATER Account 341200 Transportation Equipment Heavy Duty Trucks

This account consists of heavy-duty trucks, such as a dump truck or Ford F350.

LIFE ANALYSIS

The balance in this account is \$518 thousand. The approved life characteristic for this account is 11 R1 or 10 R5. Visual fitting based on actuarial analysis shows the 11 L2.5, and this dispersion curve is a good match to Company experience. A graph of the proposed curve vs the observed life for this account is shown below.



Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$88,360	11 R1	11 L2.5
Larkfield	\$477	11 R1	11 L2.5
Los Angeles	\$69,100	11 R1	11 L2.5
Monterey Water	\$115,189	11 R1	11 L2.5
Sacramento	\$151,471	10 R5	11 L2.5
Ventura County	\$93,550	11 R1	11 L2.5

Net Salvage

The approved net salvage for all districts is positive between 10 and 15 percent positive. The approved net salvage for all districts is positive 10 percent or positive 15 percent. The 10-year and 15-year moving average in the most recent year shows positive 5 percent for both periods. There have been no retirements since 2014. This account usually shows higher net salvage than CAW is exhibiting. Based on industry experience and judgment, a positive 10 percent net salvage is recommended for this account. The parameters for each district are shown in the table below.

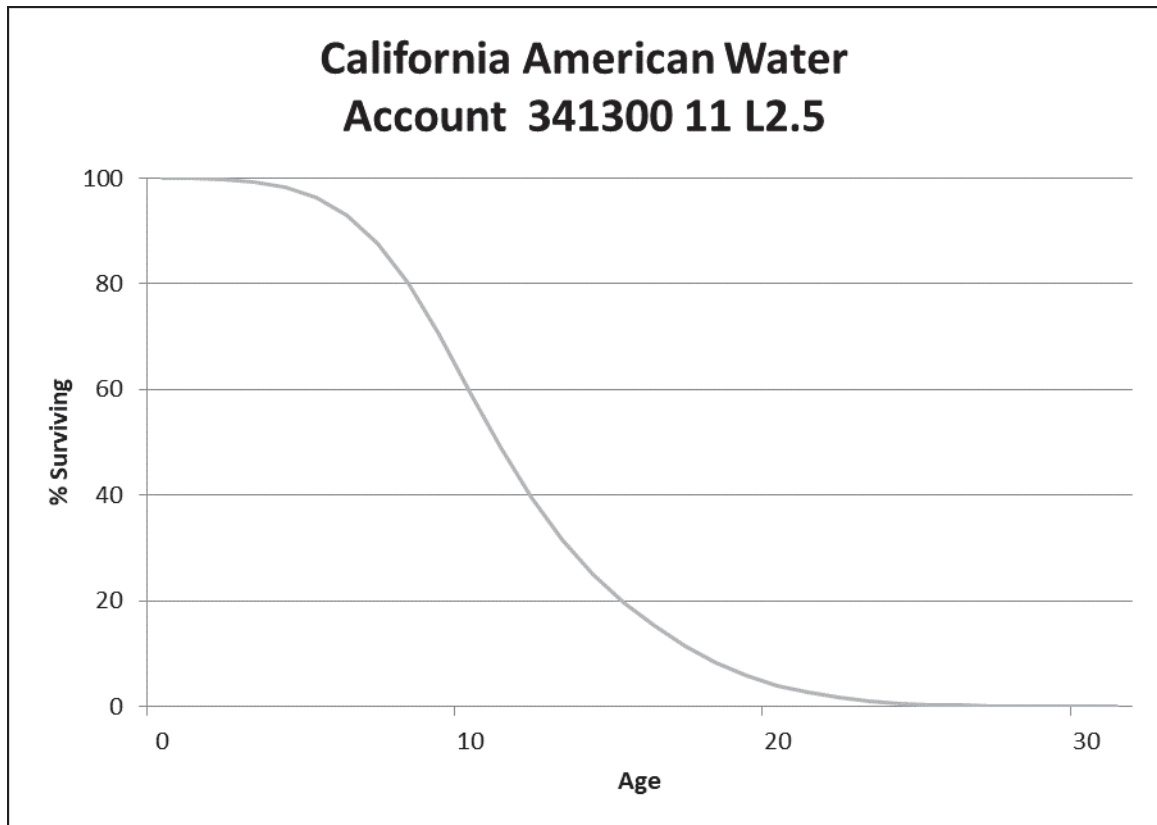
District	Approved Net Salvage	Proposed Net Salvage
Coronado	15%	10%
Larkfield	10%	10%
Los Angeles	15%	10%
Monterey Water	15%	10%
Sacramento	15%	10%
Ventura County	15%	10%

WATER Account 341300 Transportation Equipment Autos

This account consists of other automobiles.

LIFE ANALYSIS

The plant balance in this account is \$71 thousand. Given the small amount of plant in this account, actuarial analysis gives atypical results for this asset grouping. There is much more experience in Account 341200 for similar assets. Based on judgment, the type of assets in this account, actuarial analysis, and knowledge of company operations, this depreciation study recommends an 11 L2.5 dispersion curve for this account. A generic curve shape is shown below.



Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$71,347	11 R1	11 L2.5

Net Salvage

This account consists of gross salvage of removal for autos. The activity for this account is very sparse, showing positive 3 percent in the most recent 10-year average. Based on the recommendations for 341100 and 341200, a positive 10 percent net salvage is recommended for this account. The parameters for each district are shown in the table below.

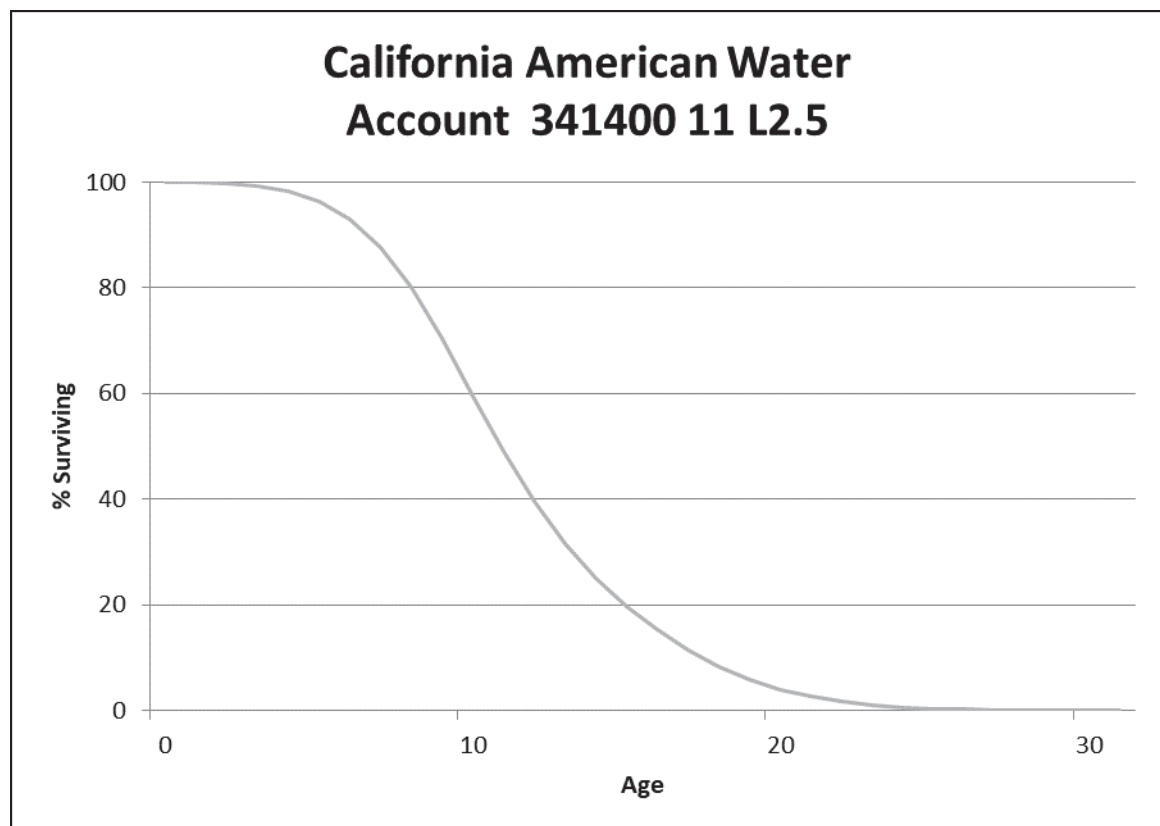
District	Approved Net Salvage	Proposed Net Salvage
Los Angeles	5%	10%

WATER Account 341400 Transportation Equipment Other Equipment Trucks

This account consists of other transportation equipment such as trailers and backhoes.

LIFE ANALYSIS

The plant balance in this account is \$209 thousand. The current life for this account is 11 years. Given the small amount of plant in this account, actuarial analysis gives atypical results for this asset grouping. There is much more experience in Account 341200 for similar assets. Based on judgment, the type of assets in this account, actuarial analysis, and knowledge of company operations, this depreciation study recommends an 11 L2.5 dispersion curve for this account. A generic curve shape is shown below.



Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$104,977	11 R1	11 L2.5
Monterey Water	\$103,566	11 R1	11 L2.5

Net Salvage

The current net salvage parameters are between positive 5 and positive 10 percent. The activity for this account is extremely unusual showing negative net salvage for this account, whereas these assets normally demonstrate positive net salvage. Based on the recommendations for 341100, 341200, and 341300, a positive 10 percent net salvage is recommended for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Coronado	10%	10%
Monterey Water	5%	10%

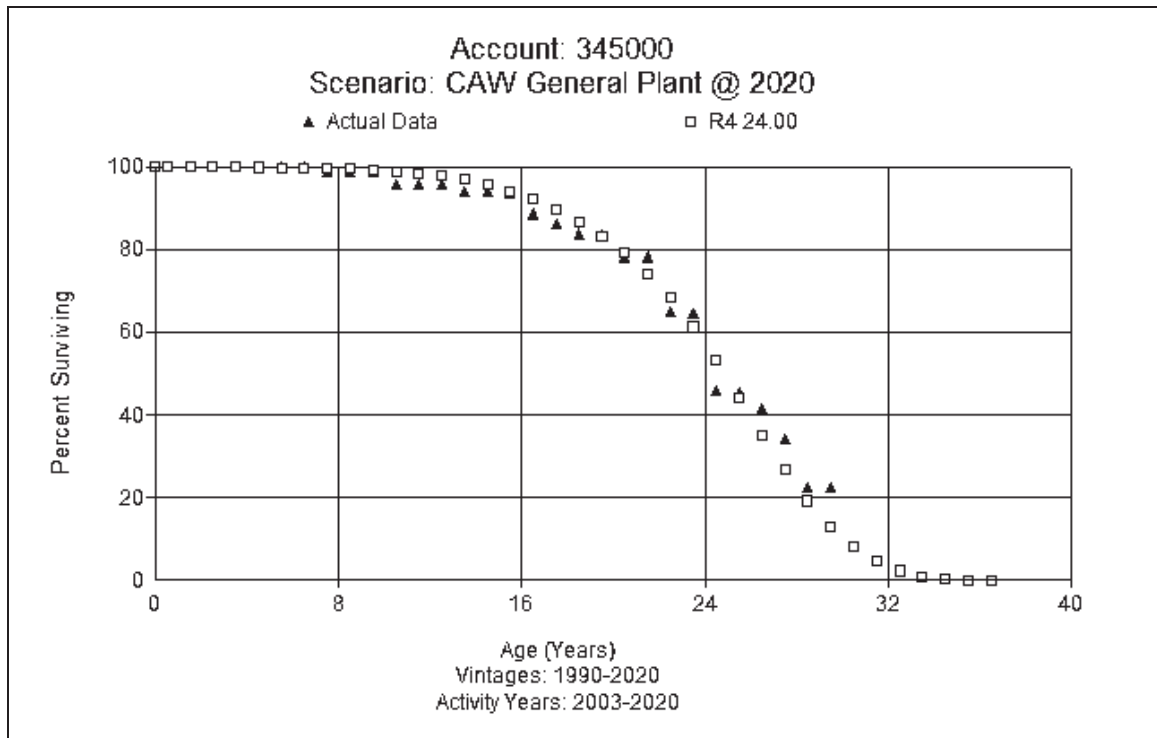
WATER Account 345000 Power Operated Equipment

This account consists of power operated equipment such as backhoes and forklifts.

LIFE ANALYSIS

The account balance is \$1.2 million for this account. The approved life characteristic for these accounts range from 18 to 23 years. Actuarial analysis shows an excellent visual match when analyzed for a 24-year life with an R4 dispersion.

A graph of the proposed curve vs the observed life for this account is shown below.



Based on judgment and actuarial analysis, this depreciation study recommends a 24 R4 dispersion curve for this account.

Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$123,003	23 S6	24 R4
Larkfield	\$57,827	23 S6	24 R4
Los Angeles	\$33,345	23 S6	24 R4
Monterey Water	\$156,298	23 S6	24 R4
Sacramento	\$431,239	18 R3	24 R4
Ventura County	\$376,379	23 S6	24 R4

Net Salvage

This account consists of gross salvage and cost of removal for power operated equipment such as backhoes and forklifts. The approved net salvage for this account is positive 15 percent for all districts. The 5-year and 10-year moving average in the most recent year shows 0 percent for both periods. Typically, the net salvage for this account is fairly similar to the 341 accounts, which for CAW are proposed to have positive 10 percent net salvage in this study. Based on knowledge of the assets in this account, experience in the 341 accounts, and judgment, this depreciation study recommends retaining positive 15 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Coronado	15%	15%
Larkfield	15%	15%
Los Angeles	15%	15%
Monterey Water	15%	15%
Sacramento	15%	15%
Ventura County	15%	15%

General Plant - Amortized (Accounts 339-340, 342-344, and 346-348)

Adoption of Vintage Group Amortization

This study recommends the adoption of vintage group amortization for certain General plant accounts. Accounts 341, Transportation Equipment, and 345, Power Operated Equipment, are excluded from this treatment. This proposed treatment includes Accounts 339-340, 342-344, and 346-348. FERC adopted Accounting Release 15 ("AR15") in 1997 using the following criteria:

1. The individual classes of assets for which vintage year accounting is followed are high volume, low value items;
2. There is no change in existing retirement unit designations, for purposes of determining when expenditures are capital or expense;
3. The cost of the vintage groups is amortized to depreciation expense over their useful lives and there is no change in depreciation rates resulting from the adoption of the vintage year accounting;
4. Interim retirements are not recognized;
5. Salvage and removal cost relative to items in the vintage categories are included in the accumulated depreciation account and assigned to the oldest vintage first; and
6. Properties are retired from the affected accounts that, at the date of the adoption of vintage year accounting, meet or exceed the average service life of properties in that account.

A vintage year method of accounting for the general plant accounts that meets all of the foregoing requirements may be implemented without obtaining specific authorization from the Commission to do so.

Accounting Release 15 was issued in 1997. Since that time, most utilities across the nation have adopted this mechanism. With the adoption of vintage group amortization, it is no longer necessary to keep track of the location and retirement of specific assets. The goal of AR-15 is to reduce the administrative burden related to tracking small dollar, large volume assets and to ensure the timely retirement of those assets. Annually, assets are retired after reaching the average service life for that account. The retirement amounts for fully accrued

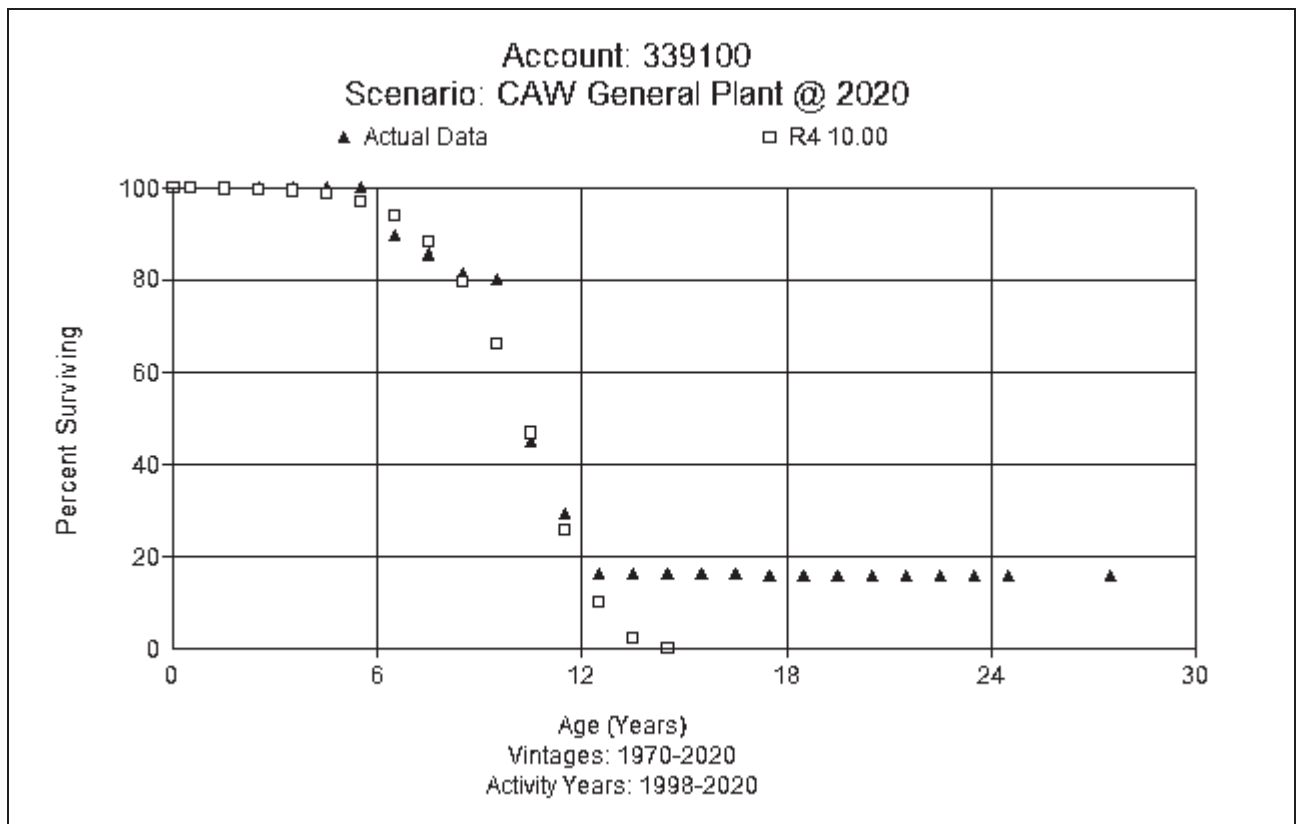
assets are shown for each account in Appendix A-1. After those assets are retired, the remaining plant in service for each account will be amortized using the amortization rates shown in Appendix A-1. An additional accrual is necessary for each plant account to make up the difference between the book depreciation reserve and the theoretical depreciation reserve. The Company requested that we use a cycle of two general rates cases as a period to recover these differences. Since there are three years between general rate cases, the amortization of reserve difference is six years. In general plant, we excluded structure accounts with the first three digits of 304, Account 341 Transportation Equipment, and Account 345 Power Operated Equipment from the AR-15 treatment.

WATER Account 339100 Other P/E Intangible

This account consists of other intangible property and equipment.

LIFE ANALYSIS

The account balance is \$112 thousand for this account. The approved life characteristic for this account is 22 L2. After performing actuarial analysis on this account, a 10-year life with an R4 dispersion is a good visual fit. A graph comparing the actual data to the Iowa Curve is shown below.



After conversion to general plant amortization, this depreciation study recommends a 10-year life with an SQ dispersion for this account. A table showing the plant amounts and parameters for each district is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$109,369	22 L2	10 SQ
Ventura County	\$2,487	22 L2	10 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent. The overall moving average in this account is 0 percent. Assets associated with software seldom produce net salvage. Based on knowledge of the assets in this account and judgment, this depreciation study recommends retaining 0 percent net salvage for this account. The parameters for each district are shown in the table below.

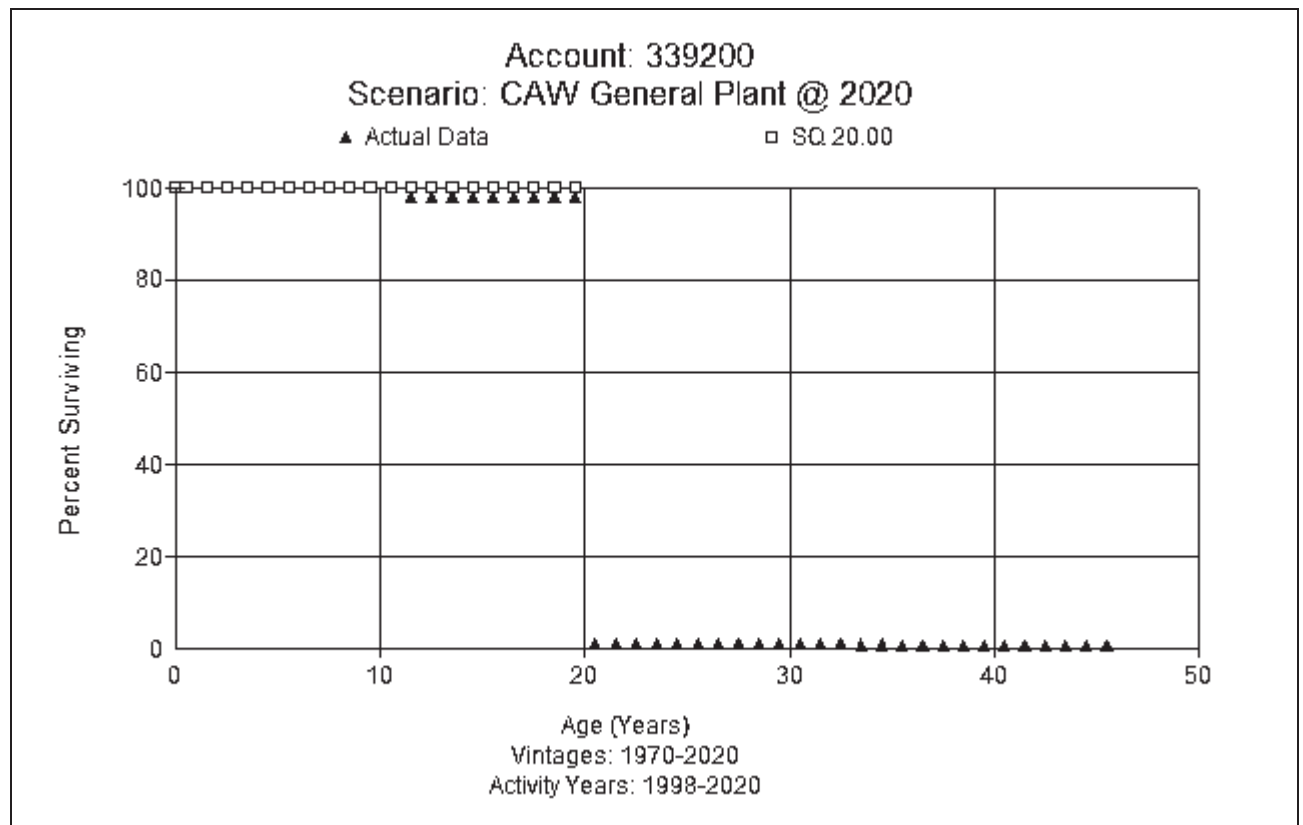
District	Approved Net Salvage	Proposed Net Salvage
Larkfield	0%	0%
Ventura County	0%	0%

WATER Account 339200 Other P/E SS

This account consists of property and equipment associated with the source of supply.

LIFE ANALYSIS

The account balance is \$124 thousand for this account. The approved life characteristic for this account is 22 R1. After performing actuarial analysis on this account, a 20-year life with an SQ dispersion is a good visual fit. A graph comparing the actual data to the IOWA Curve is shown below.



After conversion to general plant amortization, this depreciation study recommends a 20-year life with an SQ dispersion for this account. A table showing the plant amounts and parameters for each district is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Monterey Water	\$124,290	22 R1	20 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent. There has been no retirement activity from 2001-2020. The overall moving average in this account is 0 percent. Assets associated with software seldom produce net salvage. Based on knowledge of the assets in this account and judgment, this depreciation study recommends retaining 0 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Monterey Water	0%	0%

WATER Account 339300 Other P/E WT

This account consists of property and equipment associated with water treatment operations.

LIFE ANALYSIS

There is only a small amount of plant in this account and there has been no retirement experience thus far. This equipment is similar to Account 339200. Based on that similarity, this study proposes a 20 year with an SQ dispersion. No graph is shown.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$1,044	10 SQ	20 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent. There has been no retirement activity from 2001-2020. The overall moving average in this account is 0 percent. The assets in this account seldom produce net salvage. Based on knowledge of the assets in this account and judgment, this depreciation study recommends retaining 0 percent net salvage for this account. The parameters for each district are shown in the table below.

District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	0%

WATER Account 339500 Other P/E TD

This account consists of property and equipment associated with transmission and distribution operations.

LIFE ANALYSIS

The account balance is \$2.1 million for this account. The approved life characteristic for this account is ranges from 10 to 40 years. There is has only been a small retirement of \$1 thousand over the available retirement history for this account. Thus, it is not possible to perform actuarial analysis. Since 20 years is recommended for assets in 339200 and 339300 (source of supply and water treatment function), this study recommends a slightly longer life of 30 year life with an SQ dispersion for this account related to transmission and distribution. A table showing the plant amounts and parameters for each district is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$6,532	10 SQ	30 SQ
Los Angeles	\$169,826	40 R2	30 SQ
Monterey Water	\$1,964,332	22 R1	30 SQ

NET SALVAGE

The approved net salvage parameter is 0 percent. There has been no retirement activity in this account from 2001-2020. Given the sparse retirement history, this study relies upon experience in Accounts 339100, 339200, and 339600 and judgment, and recommends retaining 0 percent net salvage for this account. The parameters for each district are shown in the table below.

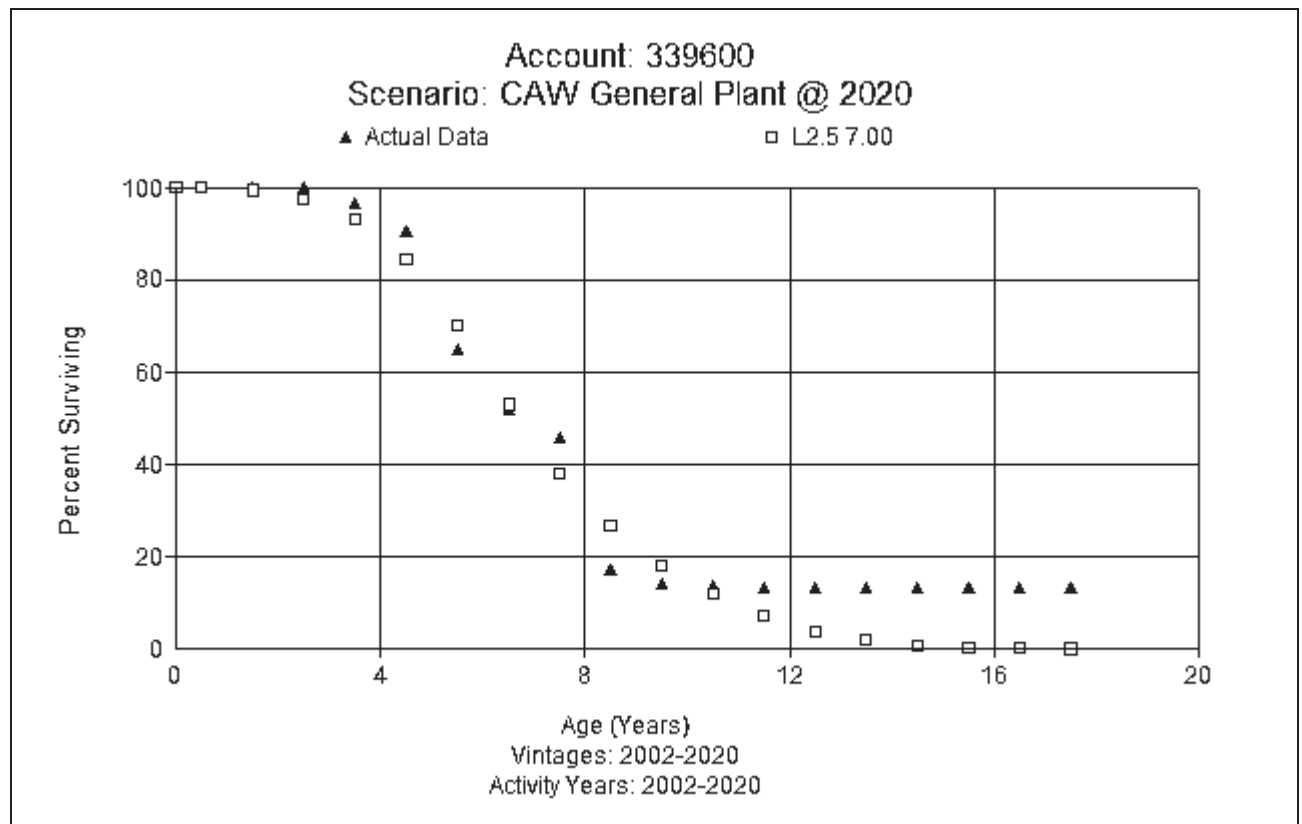
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	0%
Los Angeles	0%	0%
Monterey Water	0%	0%

WATER Account 339600 Other P/E Comprehensive Planning Studies

This account consists of property and equipment associated with comprehensive planning studies.

LIFE ANALYSIS

The plant balance in this account is \$621 thousand. Life analysis for this account shows a life of 7 years with an L2.5 dispersion, which is shown below.



Since this account is proposed for general plant amortization, this study recommends a 7-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Corporate	\$564,753	N/A	7 SQ
Monterey Water	\$55,226	N/A	7 SQ
Sacramento	\$1,139	N/A	7 SQ

NET SALVAGE

There is no currently approved net salvage parameter for any district. There has been no retirement activity in this account. Based on knowledge of the assets in this account and judgment, this depreciation study recommends 0 percent net salvage for this account. Below is a table of the parameters for each district.

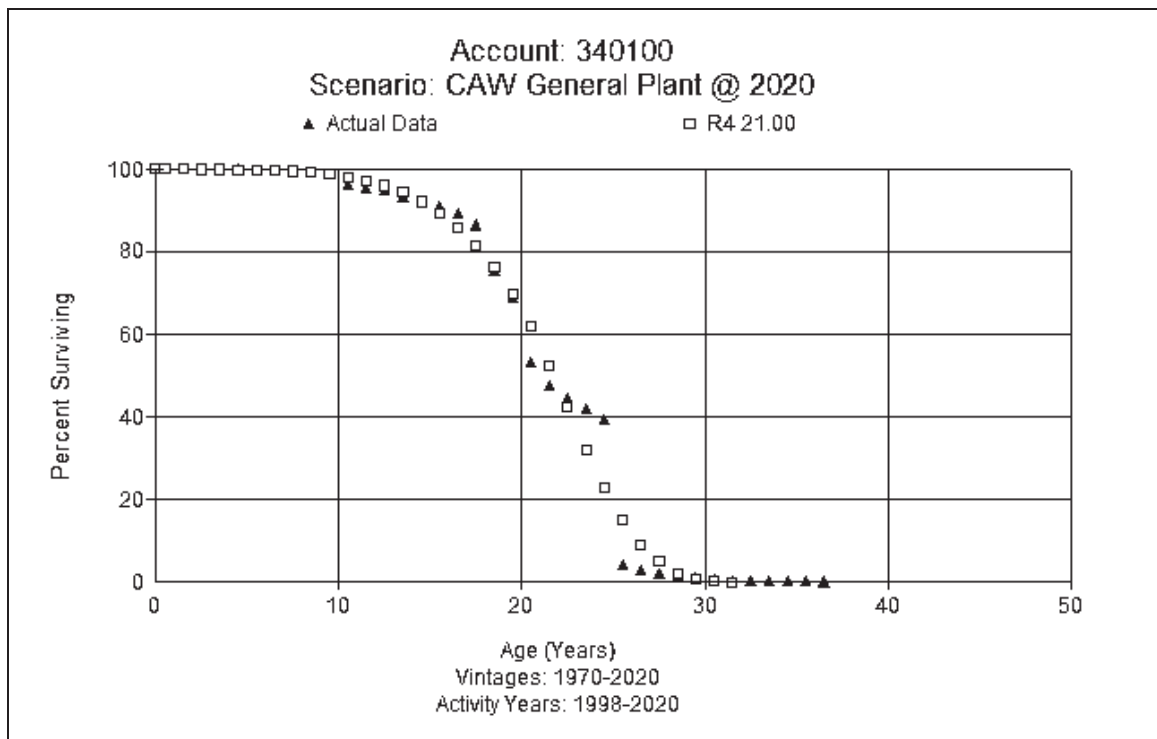
District	Approved Net Salvage	Proposed Net Salvage
Corporate	N/A	0%
Monterey Water	N/A	0%
Sacramento	N/A	0%

WATER Account 340100 Office Furniture and Equipment

This account consists of furniture and equipment such as chairs, desks, tables, and bookcases.

LIFE ANALYSIS

For all districts, the account balance is \$1.8 million. Actuarial analysis shows a 21-year life with a R4 dispersion to be a good visual match. Based on judgment, the type of assets in this account, and knowledge of company operations, this depreciation study recommends a 21 R4 dispersion curve for this account. A graph of the Iowa Curve versus the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study

recommends a 21-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$63,538	25 L4	21 SQ
Corporate	\$394,578	25 L4	21 SQ
Larkfield	\$40,890	25 L4	21 SQ
Los Angeles	\$224,142	25 L4	21 SQ
Monterey Water	\$336,799	25 L4	21 SQ
Sacramento	\$638,325	25 L4	21 SQ
Ventura County	\$53,275	25 L4	21 SQ

NET SALVAGE

For all districts and Corporate, the approved net salvage is 0 percent. The most recent 5- and 10-year moving averages show a negative 5 and negative 6 percent net salvage respectively. Based on knowledge of the assets in this account and historic activity, this depreciation study recommends 0 percent net salvage for this account. The table below shows the current and proposed parameters for each district.

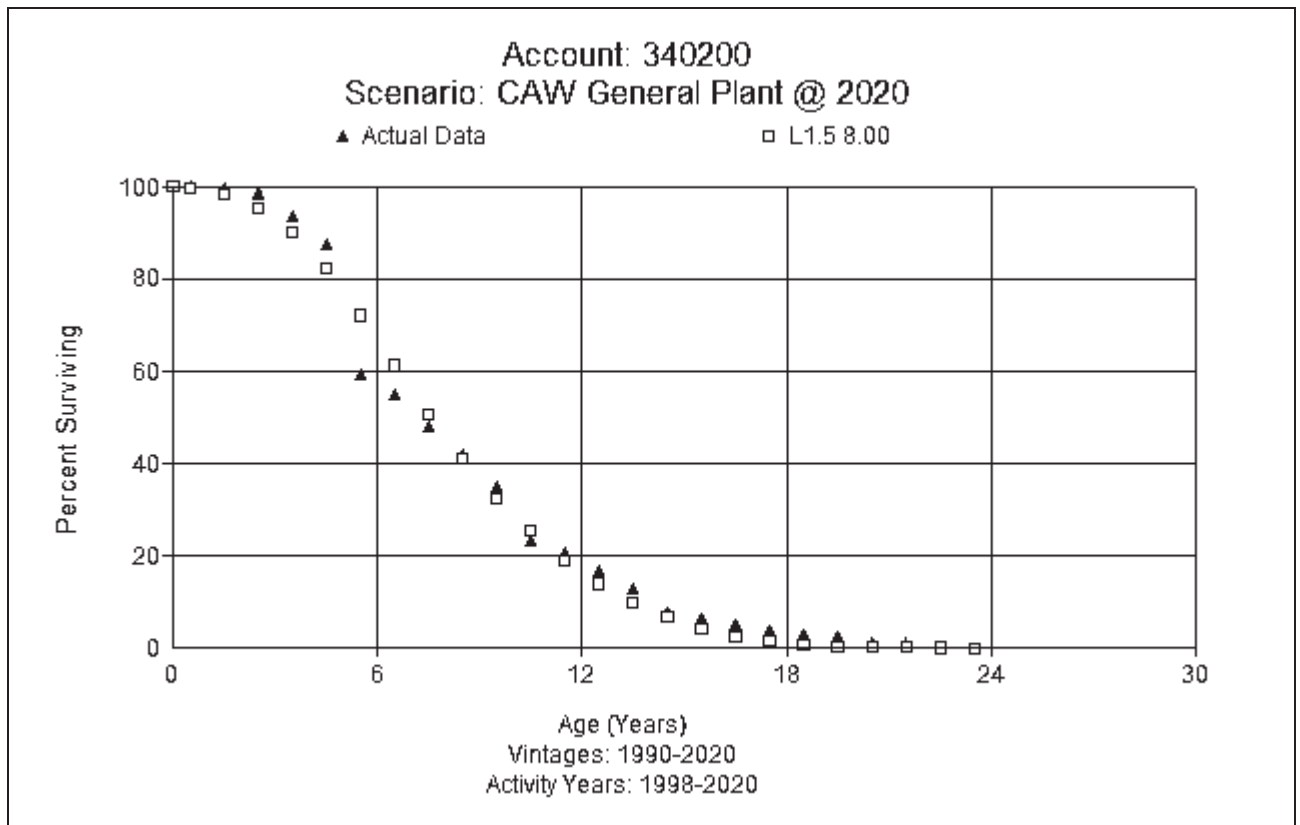
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	0%
Corporate	0%	0%
Larkfield	0%	0%
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	0%	0%
Ventura County	0%	0%

WATER Account 340200 Computer and Peripheral Equipment

This account consists of computers and other peripheral equipment.

LIFE ANALYSIS

The balance in this account is \$4.5 million. Actuarial analysis shows a good visual match for an 8-year life with an L1.5 dispersion. A graph of the Iowa Curve vs the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study recommends an 8-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$241,681	10 L2	8 SQ
Corporate	\$1,599,508	10 L2	8 SQ
Larkfield	\$11,497	10 L2	8 SQ
Los Angeles	\$173,376	10 L2	8 SQ
Monterey Water	\$968,364	10 L2	8 SQ
Sacramento	\$1,390,993	10 L2	8 SQ
Ventura County	\$76,745	10 L2	8 SQ

NET SALVAGE

For all districts and Corporate, the approved net salvage is 0 percent. The most recent 5- and 10-year moving averages show a negative 2 and negative 1 percent net salvage respectively for each period. Based on retirement history, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

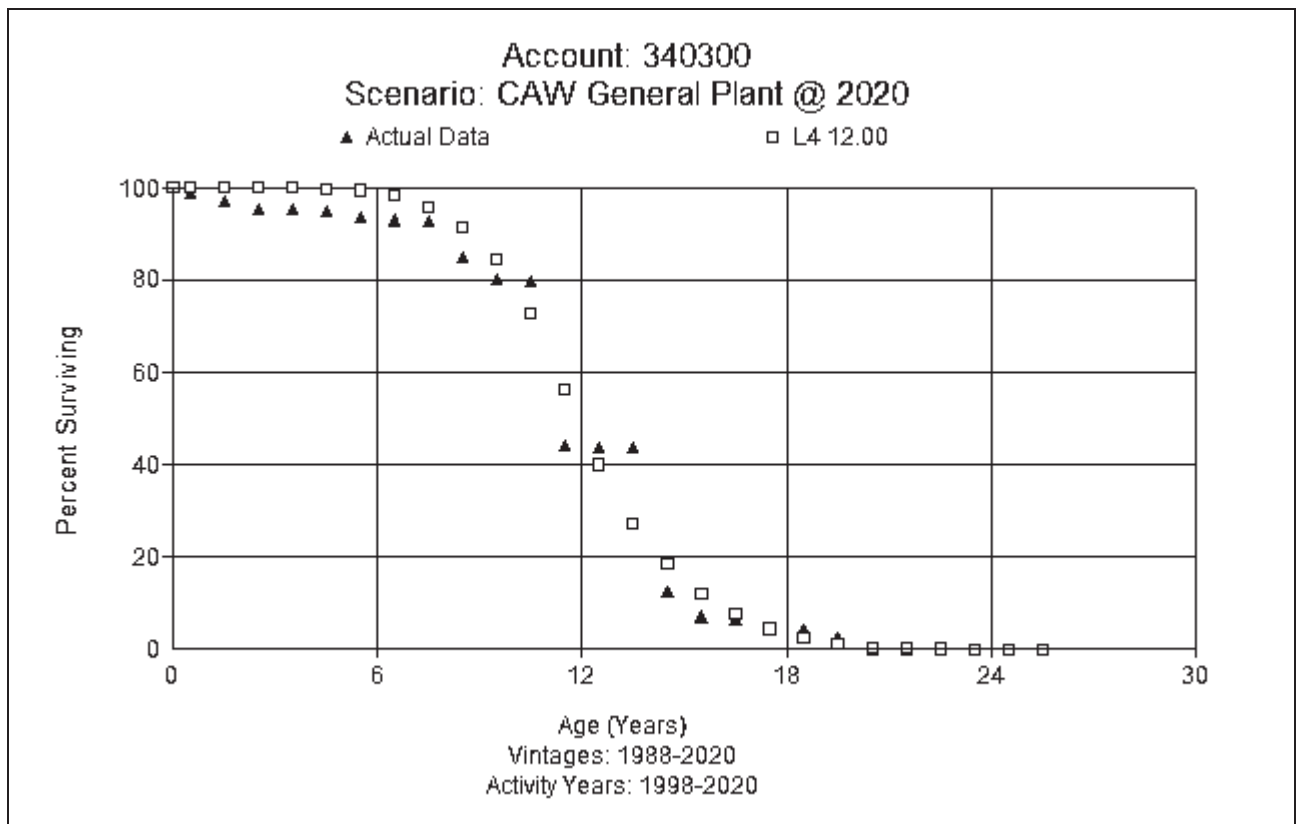
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	0%
Corporate	0%	0%
Larkfield	0%	0%
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	0%	0%
Ventura County	0%	0%

WATER Account 340300 Computer Software

This account consists of computer software and other peripheral equipment.

LIFE ANALYSIS

The account balance is \$9.9 million for this account. After performing actuarial analysis on this account, a visual fit of a 12-year life with an L4 dispersion is a representation of historic activity. A graph of the Iowa Curve versus the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study recommends a 12-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Corporate	\$9,754,423	7 L2	12 SQ
Sacramento	\$55,523	7 L2	12 SQ
Ventura County	\$50,834	7 L2	12 SQ

Net Salvage

The approved net salvage for all districts and Corporate ranges from is 0 percent. The most recent 5- and 10-year moving averages show a 0 percent for each period. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage	Proposed Net Salvage
Corporate	0%	0%
Sacramento	0%	0%
Ventura County	0%	0%

WATER Account 340310 Mainframe Computer Software

This account consists of mainframe computer software.

LIFE ANALYSIS

The account balance is \$21.7 million for this account. These assets have no existing life parameter. Major mainframe systems have a longer life than assets that are in Account 340300. Based on judgment, the type of assets in this account, and knowledge of company operations, this depreciation study recommends a 15 SQ dispersion curve for this account. Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Corporate	\$21,674,555	NA	15 SQ
Monterey	\$7,107	NA	15 SQ

NET SALVAGE

There is no net salvage activity as yet for this account. At present, there is no net salvage parameter for this account. Software assets in this account should have similar net salvage to Account 340300. Based on judgment and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

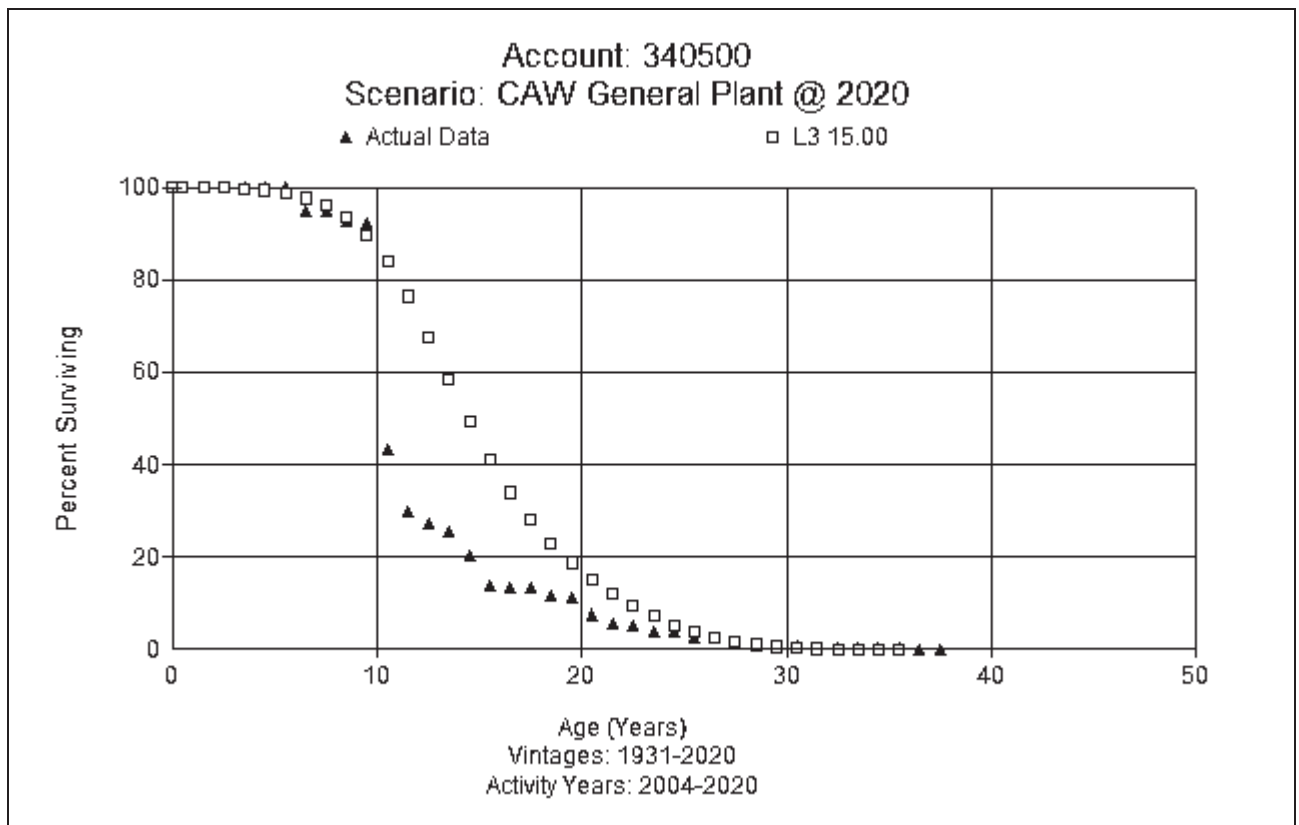
District	Approved Net Salvage	Proposed Net Salvage
Corporate	NA	0%
Monterey	NA	0%

WATER Account 340500 Other Office Equipment

This account consists of furniture and other office equipment such as copiers, maps, camcorders, and cameras.

LIFE ANALYSIS

The account balance is \$21 thousand for this account. The approved life characteristic for this account is 20 years. Actuarial analysis shows a life of approximately 12 years. That change is very large given the small amount of investment. To move in the direction of this trend, this depreciation study recommends a 15 L3 dispersion curve for this account. A graph of the proposed curve versus the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study recommends a 15-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$13,985	20 L0	15 SQ
Monterey Water	\$2,019	20 L0	15 SQ
Sacramento	\$5,171	20 L0	15 SQ

NET SALVAGE

For all districts, the approved net salvage is 0 percent. The most recent 5- and 10-year moving averages show 0 percent for each period. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

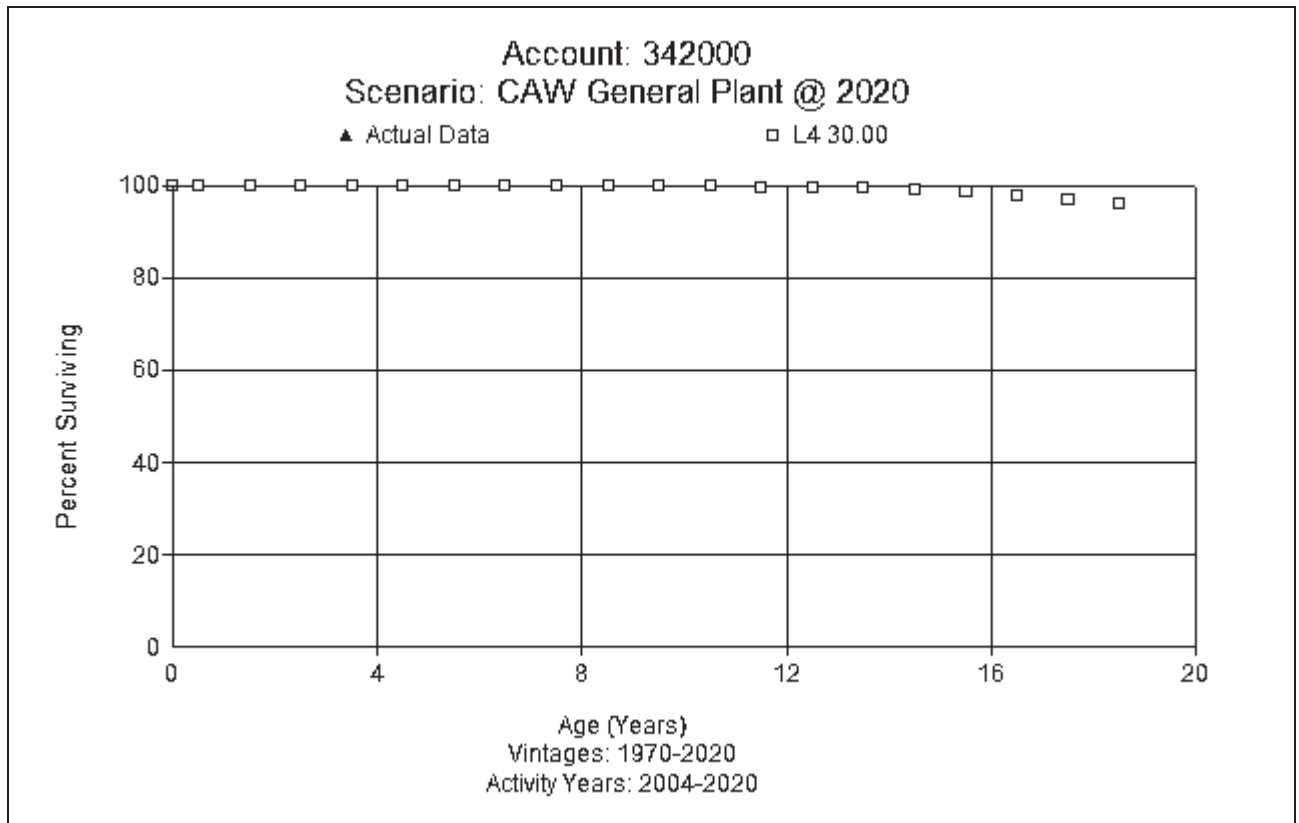
District	Approved Net Salvage	Proposed Net Salvage
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	0%	0%

WATER Account 342000 Stores Equipment

This account consists of stores equipment.

LIFE ANALYSIS

The balance in this account is \$8 thousand. The approved life characteristic is 30 R1.5. Retirement history is limited, and actuarial analysis was of limited use in determining a life parameter. This study recommends retaining the 30-year life with an L4 dispersion as a representation of historic activity. A graph of the Iowa Curve versus the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study recommends a 30-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Los Angeles	\$2,502	30 R1.5	30 SQ
Ventura County	\$5,601	30 R1.5	30 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent. For all districts, the approved net salvage is 0 percent. The most recent 5- and 10-year moving averages show 0 percent for each period. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

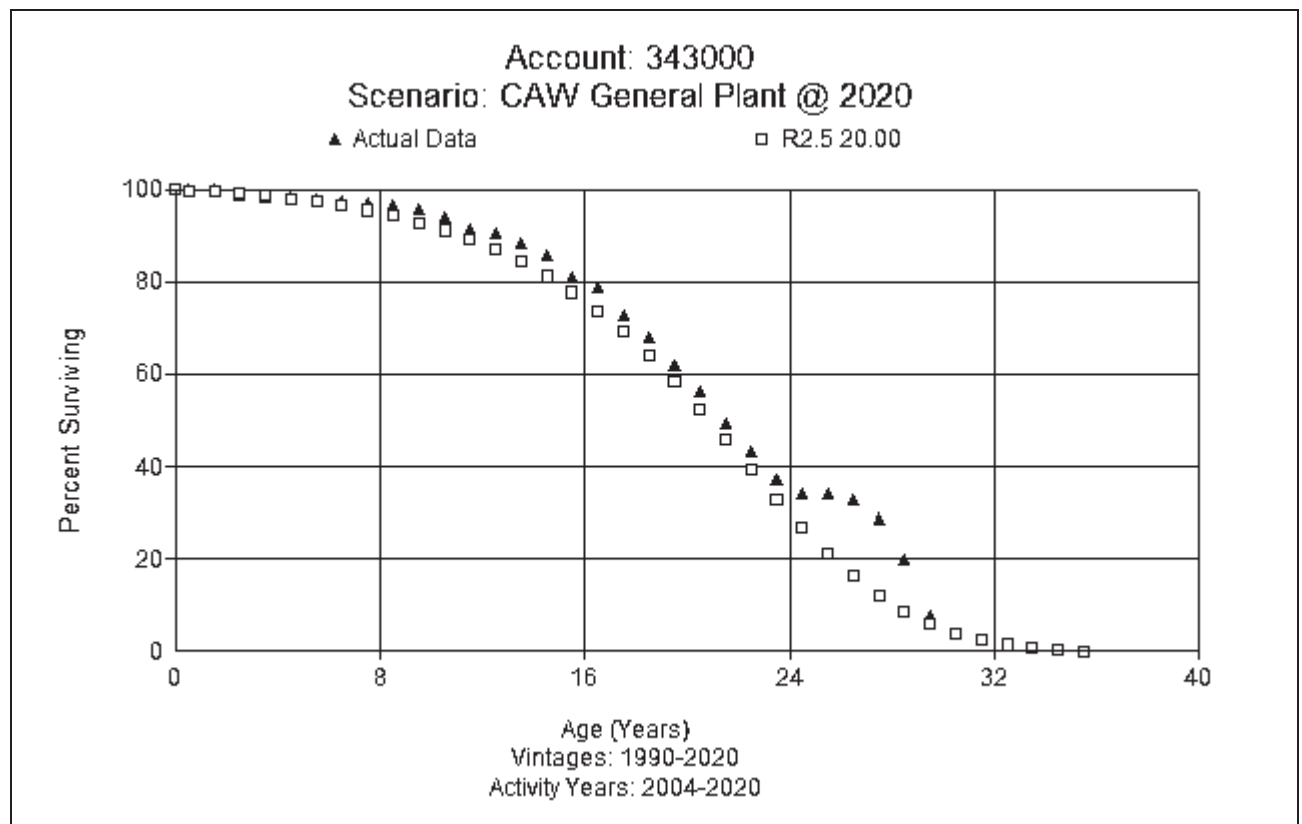
District	Approved Net Salvage	Proposed Net Salvage
Los Angeles	0%	0%
Ventura County	0%	0%

WATER Account 343000 Tools, Shop, and Garage Equipment

This account consists of tools, shop, and garage equipment such as drilling machines and detection equipment.

LIFE ANALYSIS

The account balance is \$1.9 million for this account. After performing actuarial analysis on this account, a visual fit of a 20-year life with an R2.5 dispersion is a representation of historic activity. A graph of the Iowa Curve versus the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study recommends a 20-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$334,628	28 S6	20 SQ
Corporate	\$4,813	20 R2	20 SQ
Larkfield	\$61,160	28 S6	20 SQ
Los Angeles	\$209,807	28 S6	20 SQ
Monterey Water	\$495,707	28 S6	20 SQ
Sacramento	\$579,264	28 S6	20 SQ
Ventura County	\$242,498	28 S6	20 SQ

NET SALVAGE

The approved net salvage for this account for all districts is 0 percent. For all districts, the approved net salvage is 0 percent. The most recent 5- and 10-year moving averages show a 1 percent and negative 5 percent respectively. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

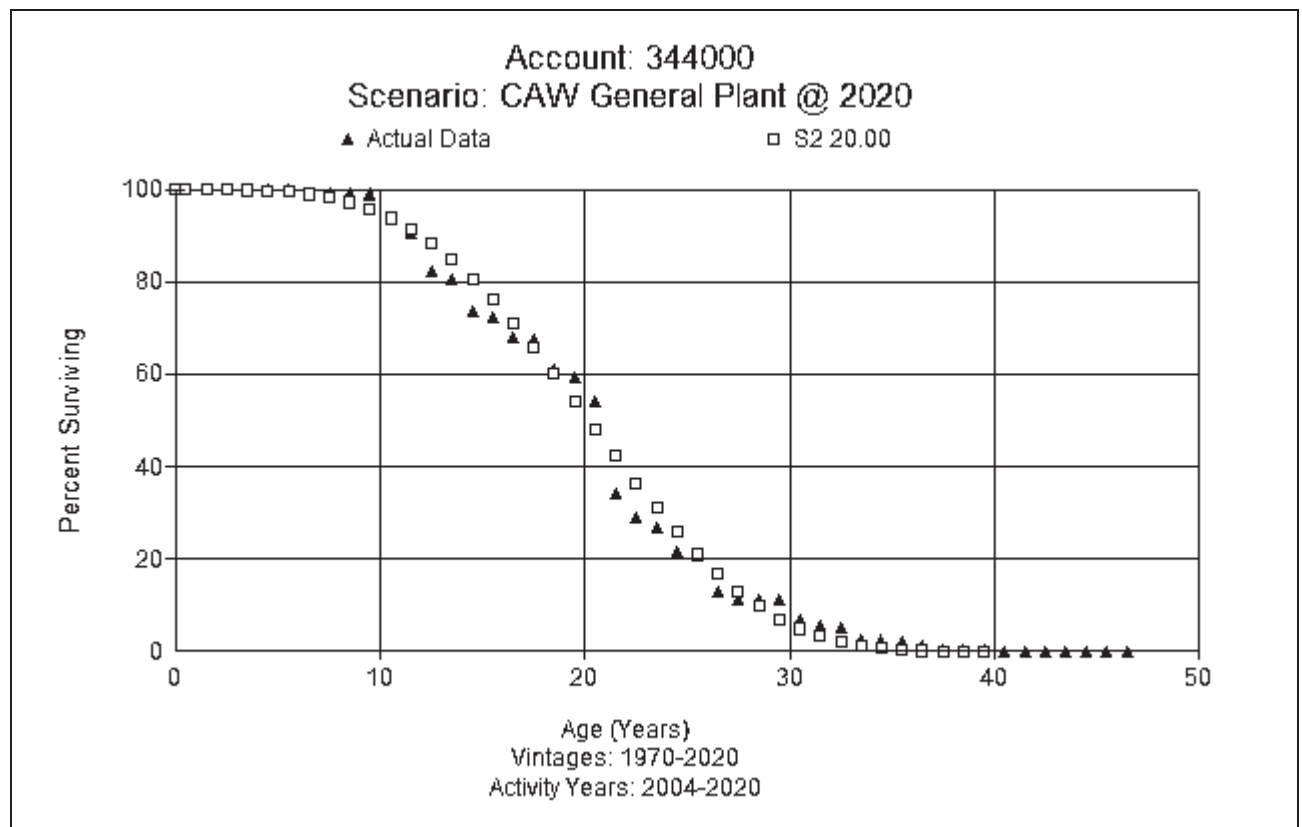
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	0%
Corporate	0%	0%
Larkfield	0%	0%
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	0%	0%
Ventura County	0%	0%

WATER Account 344000 Laboratory Equipment

This account consists of laboratory equipment such as water monitoring equipment and other devices.

LIFE ANALYSIS

The account balance is \$439 thousand for this account. The approved life characteristic for this account is 20 years. After performing actuarial analysis, a 20-year life with an S2 dispersion is a good visual match. A graph of the Iowa Curve vs the observed life for this account is shown below.



Since this account is proposed for general plant amortization, this study recommends a 20-year life with an SQ dispersion. A table showing plant balance and parameters is shown below.

Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield		20 R2	20 SQ
Los Angeles	\$4,802	20 R2	20 SQ
Monterey Water	\$178,127	20 R2	20 SQ
Sacramento	\$255,682	20 R2	20 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent for all districts. The most recent 5- and 10-year moving averages show 0 percent for both periods. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Net Salvage	Proposed Net Salvage
Larkfield	0%	0%
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	0%	0%

WATER Account 346100 Communication Equipment Non-Telephone

This account consists of non-telephone communication equipment such as analytical water monitoring instruments, telemetry, and other related equipment.

LIFE ANALYSIS

The account balance is \$10.4 million for this account. The current approved life is 18 years. The pace of technology for communication equipment is moving rapidly. Actuarial analysis shows a similar life to the existing, but this is not indicative of future expectations. Based on judgment and the rapid pace of technology change, this depreciation study recommends a 10 SQ dispersion curve for this account. No graph is shown.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$59,400	18 R3	10 SQ
Larkfield	\$22,052	18 R3	10 SQ
Los Angeles	\$1,202,577	18 R3	10 SQ
Monterey Water	\$4,774,682	18 R3	10 SQ
Sacramento	\$4,328,736	18 R3	10 SQ
Ventura County	\$50,388	18 R3	10 SQ

NET SALVAGE

The approved net salvage for all districts is 0 percent net salvage. The most recent 5- and 10-year moving averages show negative 1 and 0 percent respectively. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Salvage	Net	Proposed Salvage	Net
Coronado		0%		0%
Larkfield		0%		0%
Los Angeles		0%		0%
Monterey Water		0%		0%
Sacramento		0%		0%
Ventura County		0%		0%

WATER Account 346190 Communication Equipment Remote Control and Instrumentation

This account consists of remote control and instrumentation communication equipment such as data loggers, RTUs, and other related equipment.

LIFE ANALYSIS

The account balance is \$7.8 million for this account. The approved life characteristic is 18 years for all but one district, and another with an unknown parameter. The observed life table for this account does not drop below 82 percent surviving, which is insufficient for actuarial analysis. The pace of technology for communication equipment is moving rapidly. Based on the recommendation for Account 346100, this depreciation study recommends moving to a 10 SQ dispersion curve for this account. No graph is shown.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$261,028	N/A	10 SQ
Larkfield	\$276,725	18 R3	10 SQ
Los Angeles	\$422,155	18 R3	10 SQ
Monterey Water	\$2,391,529	18 R3	10 SQ
Sacramento	\$3,032,006	18 R3	10 SQ
Ventura County	\$1,372,371	18 R3	10 SQ

NET SALVAGE

The approved net salvage for all districts is 0 percent net salvage. The most recent 5- and 10-year moving averages show negative 17 and negative 15 percent respectively. Based on historical activity, judgment, and knowledge of the assets in this account, this depreciation study recommends retaining 0 percent net salvage for this account. A table showing parameters for each district is shown below.

District	Approved Salvage	Net	Proposed Salvage	Net
Coronado		0%		0%
Larkfield		0%		0%
Los Angeles		0%		0%
Monterey Water		0%		0%
Sacramento		0%		0%
Ventura County		0%		0%

WATER Account 346200 Communication Equipment Telephone

This account consists of telephone systems and other related communication equipment.

LIFE ANALYSIS

The account balance is \$2.0 million for this account. The approved life characteristic for this account is 18 years for two districts and no parameter for another district. The observed life table for this account does not drop below 89 percent surviving, which is insufficient for actuarial analysis. The pace of technology change for communication equipment is increasing rapidly. Based on the recommendations for Accounts 346100 and 346190, this depreciation study recommends moving to a 10 SQ dispersion curve for this account. No graph is shown.

Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Corporate	\$33,319	N/A	10 SQ
Monterey Water	\$28,824	18 R3	10 SQ
Sacramento	\$1,899,615	18 R3	10 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent. The 5-year and 10-year moving averages in the most recent period show 0 percent net salvage. Based on knowledge of the assets in this account, history, and judgment, this depreciation study recommends retaining 0 percent net salvage for this account. The results for each district are shown in the table below.

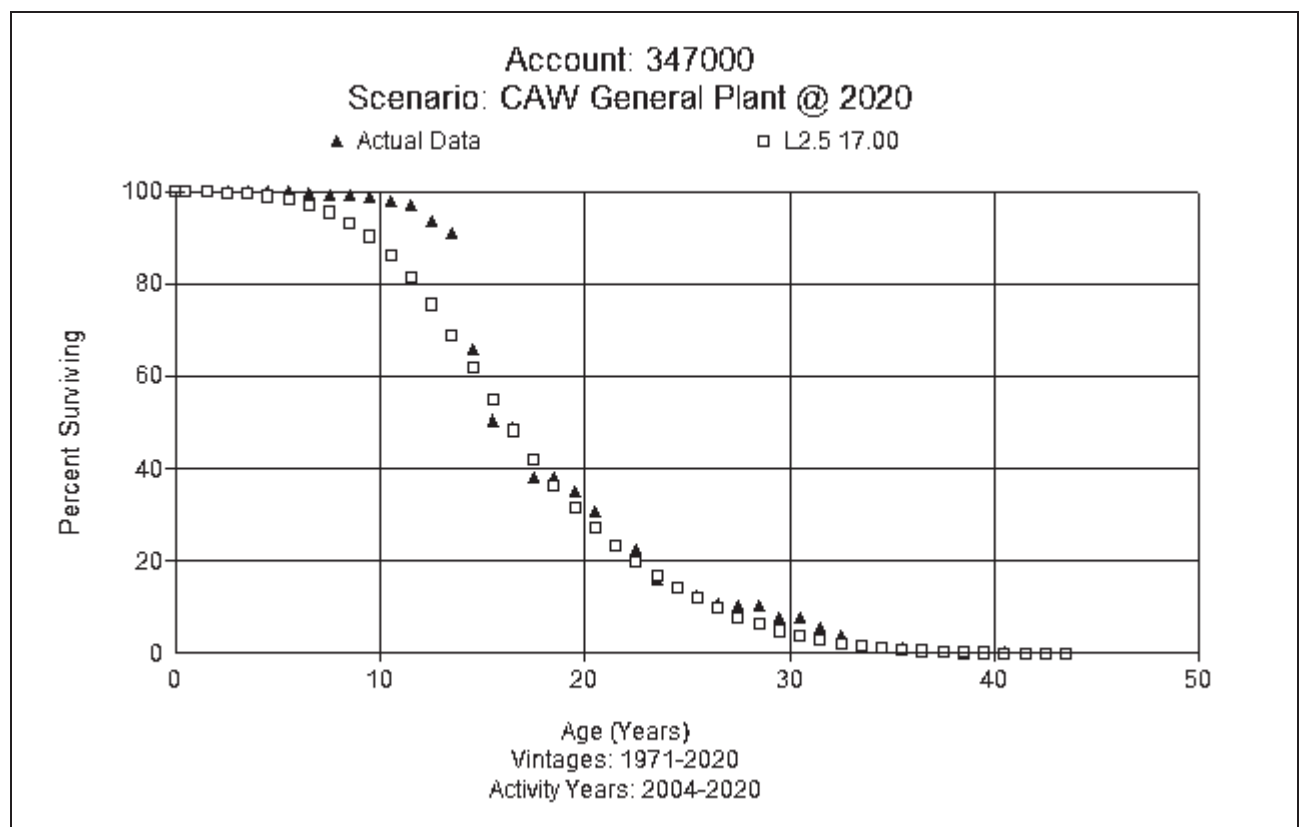
District	Approved Salvage	Net	Proposed Salvage	Net
Corporate		0%		0%
Monterey		0%		0%
Sacramento		0%		0%

WATER Account 347000 Miscellaneous Equipment

This account consists of miscellaneous equipment such as storage tanks.

LIFE ANALYSIS

The account balance is \$3.2 million for this account. The approved life characteristic for this account ranges from 13 to 18 years. After performing actuarial analysis, a 17-year life with an L2.5 provides a good visual match. A graph of the proposed curve vs the observed life for this account is shown below.



Since this account is planned to adopt general plant amortization, this depreciation study recommends moving to a 17-year life with an SQ dispersion curve for this account. Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Coronado	\$197,828	13 S5	17 SQ
Corporate	\$12,353	13 S5	17 SQ
Larkfield	\$40,370	13 S5	17 SQ
Los Angeles	\$73,085	13 S5	17 SQ
Monterey Water	\$155,961	13 S5	17 SQ
Sacramento	\$2,488,278	18 R3	17 SQ
Ventura County	\$212,654	13 S5	17 SQ

Net Salvage

The approved net salvage for this account is 0 percent. The 5-year and 10-year moving averages in the most recent period show negative 2 percent net salvage. Based on knowledge of the assets in this account, history, and judgment, this depreciation study recommends retaining 0 percent net salvage for this account. Below is a table of the parameters for each district.

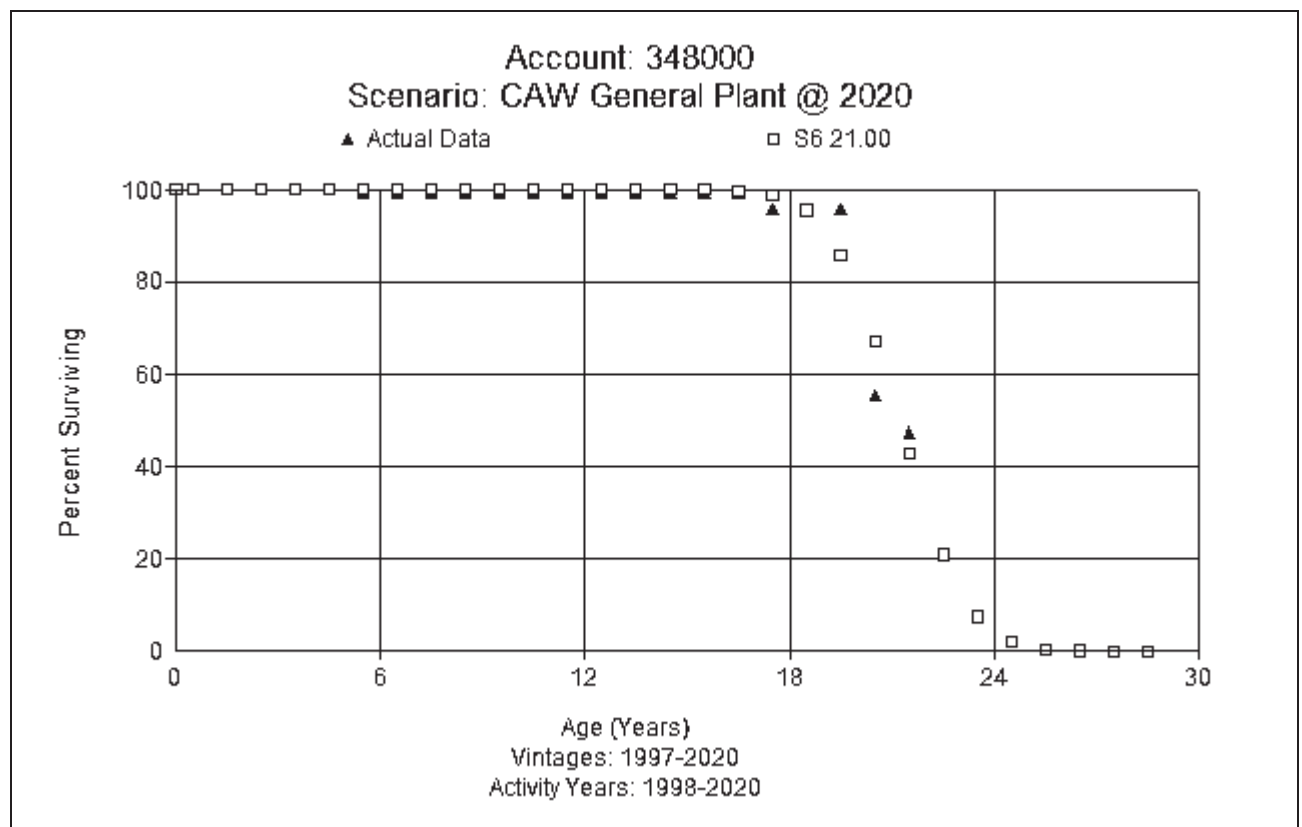
District	Approved Net Salvage	Proposed Net Salvage
Coronado	0%	0%
Larkfield	0%	0%
Los Angeles	0%	0%
Monterey Water	0%	0%
Sacramento	0%	0%
Ventura County	0%	0%

Water Account 348000 Other Tangible Property

This account consists of other tangible property such as chart records and analytic water monitoring equipment.

LIFE ANALYSIS

The account balance is \$280 thousand for this account. The approved life characteristic for this account is 20 years. After performing actuarial analysis on combined data, the best visual match is 21 years with an S6 dispersion. A comparison of actual data and the Iowa Curve is shown below.



Since this account is planned to adopt general plant amortization, this depreciation study recommends moving to a 21-year life with an SQ dispersion curve for this account. Below is a table of the amounts and parameters for each district.

District	Plant Balance	Approved Life Characteristic	Proposed Life Characteristic
Larkfield	\$23,969	20 R2	21 SQ
Los Angeles	N/A	20 R2	21 SQ
Sacramento	\$231,845	20 R2	21 SQ
Ventura County	\$24,535	20 R2	21 SQ

NET SALVAGE

The approved net salvage for this account is 0 percent for all districts. The 5-year and 10-year moving averages in the most recent period show 0 percent net salvage. Based on knowledge of the assets in this account, history, and judgment, this depreciation study recommends retaining 0 percent net salvage for this account. Below is a table of the parameters for each district.

District	Approved Net Salvage	Proposed Net Salvage
Larkfield	0%	0%
Los Angeles	0%	0%
Sacramento	0%	0%
Ventura County	0%	0%

WASTEWATER PLANT

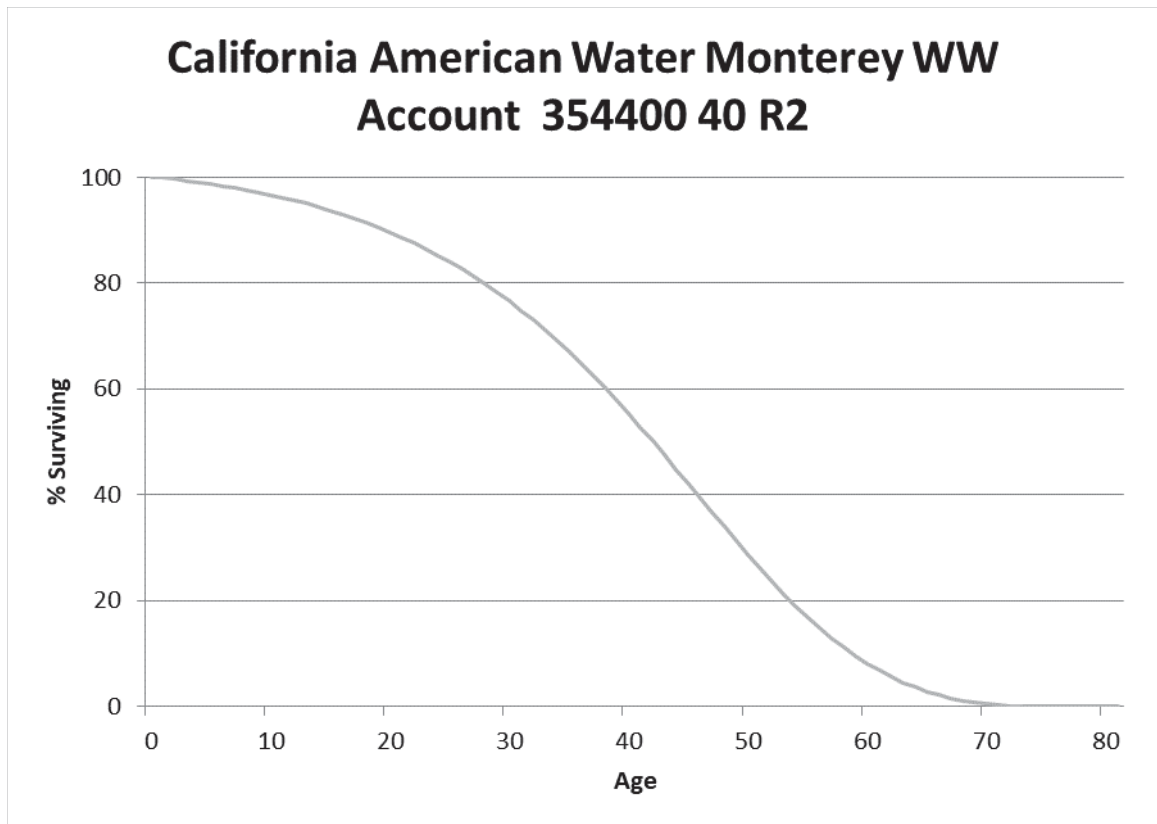
CAW has wastewater plant in two districts: Monterey Wastewater and Sacramento. The Sacramento assets were recently acquired in the Dunnigan area. There is insufficient data to analyze the history for the Sacramento plant. After discussion with Company SMEs, this study uses the same proposed parameters for the Sacramento wastewater assets.

WASTEWATER Account 354400 Wastewater Structures and Improvements Treatment

This account consists of structures and improvements used in connection with wastewater collection, pumping, treatment and disposal, reclaimed water treatment, and distribution and general plant operations.

LIFE ANALYSIS

The account balance is \$2.9 million in the Sacramento district and \$1.9 million in Monterey WW district for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis since the observed life table ends at 94 percent surviving. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on judgment and Company directive, this depreciation study recommends retention of 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

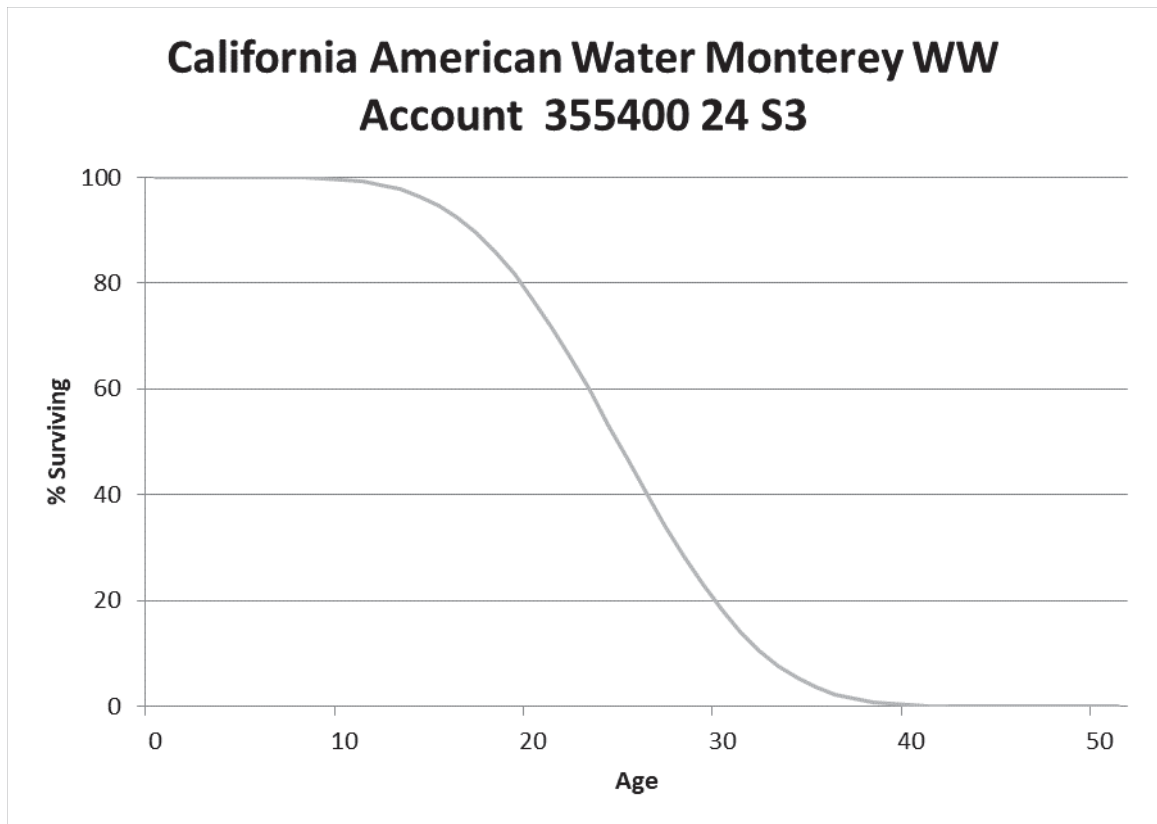
The approved net salvage for this account is negative 10 percent. In the most recent year, the 5- and 10-year moving averages show negative 22 and negative 24 percent respectively. Since the retirement data is limited, this study recommends remaining at the current net salvage percentage. Based on knowledge of the assets and judgment, this depreciation study recommends retention of negative 10 percent net salvage for this account.

WASTEWATER Account 355400 Wastewater Power Gen Equipment Treatment

This account consists of power generator equipment used in connection with wastewater collection, pumping, treatment and disposal, reclaimed water treatment, and distribution and general plant operations.

LIFE ANALYSIS

The account balance is \$8 thousand for this account. The approved life characteristic is not known. The account is small and recent retirements in 2004 and 2017 show the observed life table dropping at age 8 down to 20%. That pattern may be atypical of these assets going forward, since the facilities were acquired in 2002. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on judgment and Company directive, this depreciation study recommends a 24 S3 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

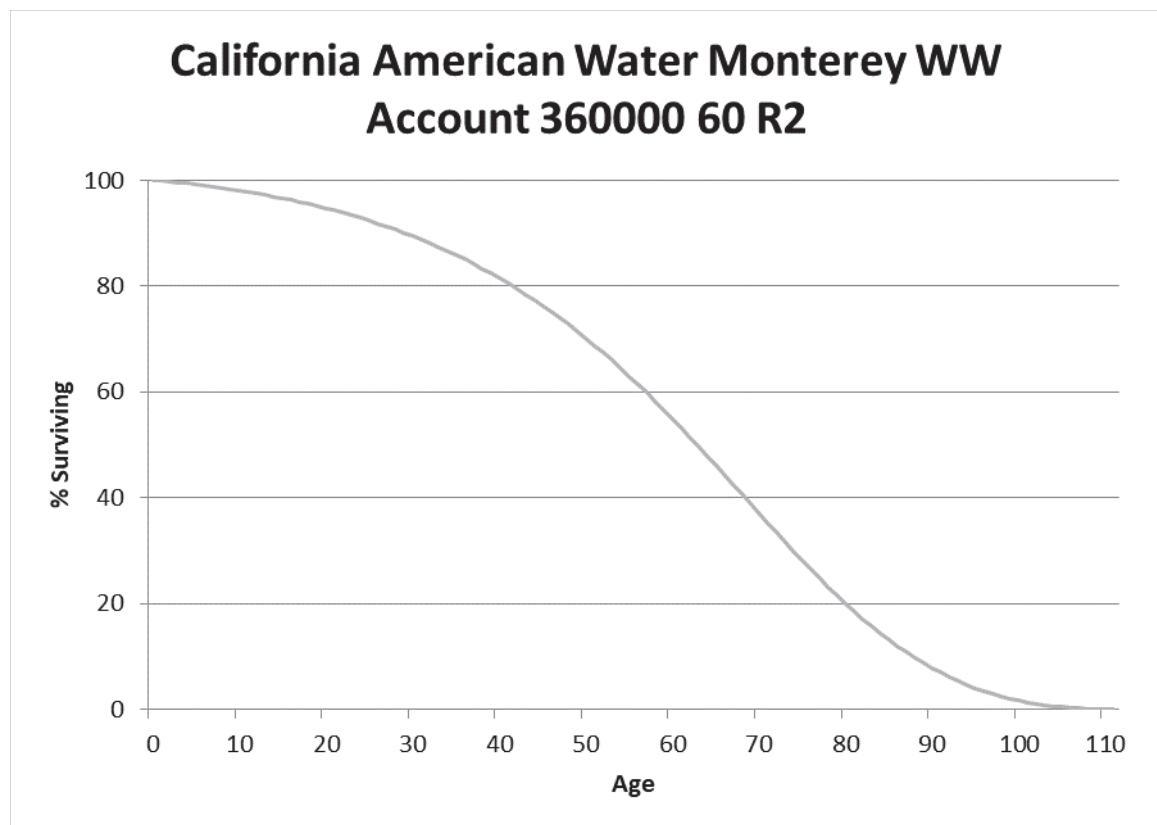
There was no investment in this account at the time of the last depreciation study. In the most recent year, the 5- and 10-year moving averages show negative 14 and negative 16 percent respectively. To move in the direction of this trend, this depreciation study recommends moving to negative 10 percent net salvage for this account.

WASTEWATER Account 360000 Wastewater Collection Sewers Forced

This account consists of all sewers which are used to lift sewage from a low elevation to a higher elevation.

LIFE ANALYSIS

The account balance is \$33 thousand for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there have been no retirements to make it possible to perform life analysis. Since assets in this account are similar to Water Mains in Account 331, a longer life is operationally logical for this account. Wastewater assets are exposed to more chemicals which will make these facilities last a shorter period of time than 80 years for water mains. Based on judgment and comparison to water facilities owned by CAW, this depreciation study recommends moving to a 60 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

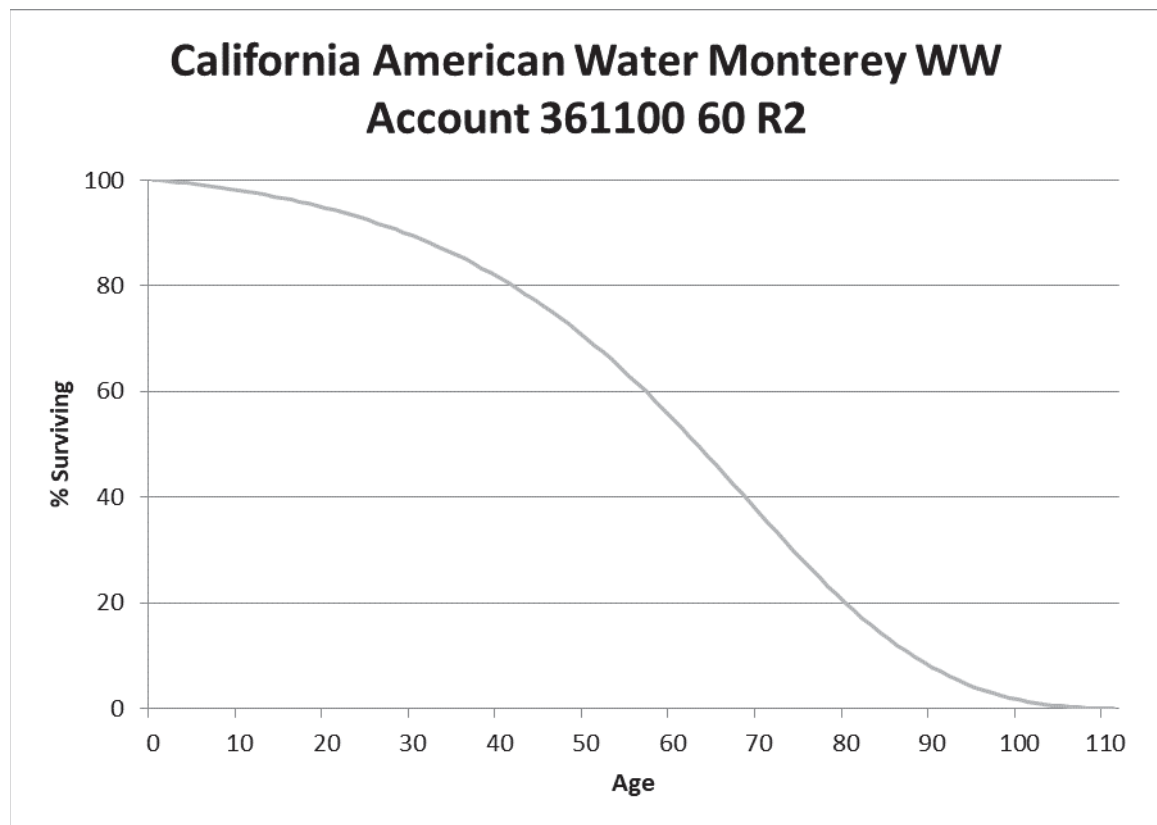
The approved net salvage for this account is negative 10 percent. Incorporating judgment, this depreciation study recommends retention of negative 10 percent net salvage for this account.

WASTEWATER Account 361100 Wastewater Collecting Mains

This account consists of gravity collecting sewers, interceptor, branch, trunk, and laterals.

LIFE ANALYSIS

The account balance is \$3.9 million in the Monterey WW district and \$367 thousand in the Sacramento district for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Since assets in this account are similar to Water Mains in Account 331, a longer life is operationally logical for this account. Wastewater assets are exposed to more chemicals which will make these facilities last a shorter period of time than 80 years for water mains. Based on judgment and comparison to water facilities owned by CAW, this depreciation study recommends moving to a 60 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

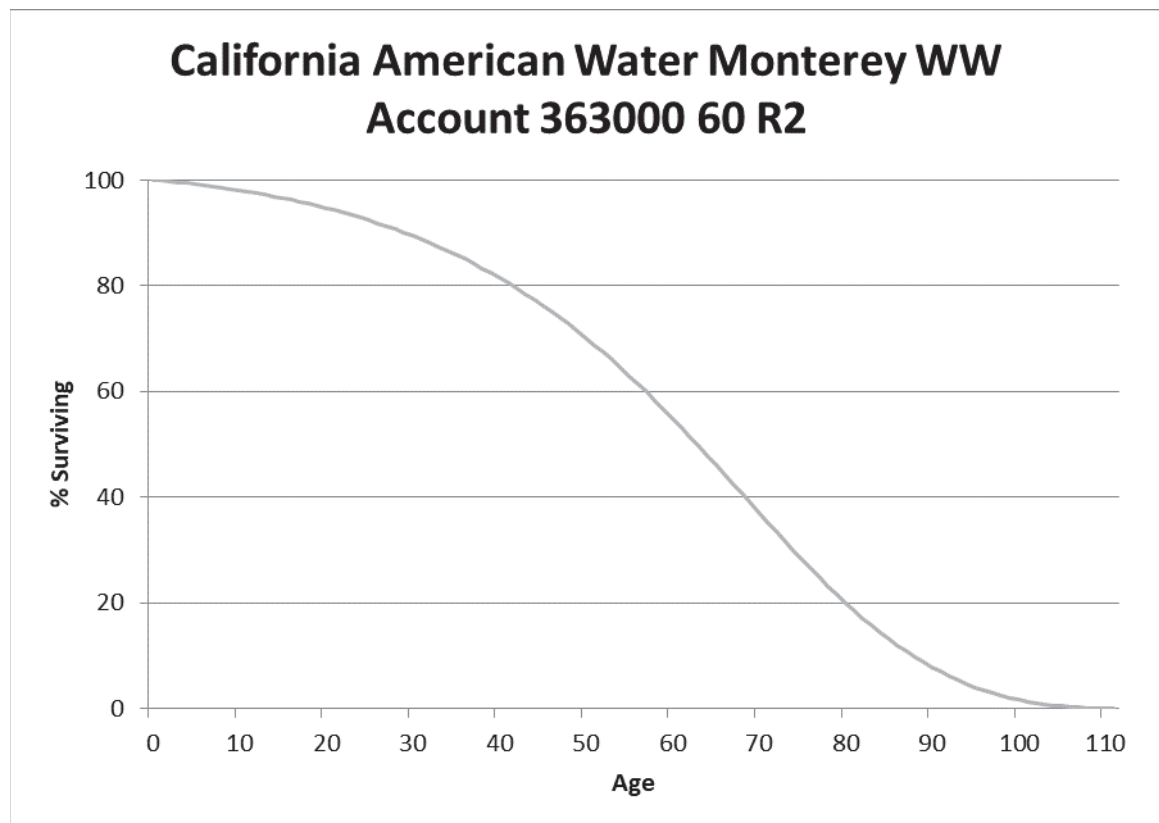
The approved net salvage for this account is 0 percent. In the most recent year, the 5- and 10-year moving averages show negative 21 and negative 15 percent respectively. To comply with the Company's request, this depreciation study recommends retention of 0 percent net salvage for this account.

WASTEWATER Account 363000 Wastewater Services Sewers

This account consists of service sewers, from collection sewer to the customer's property or curbs line.

LIFE ANALYSIS

The account balance is \$23 thousand in Monterey WW district for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Since assets in this account are similar to Water Mains in Account 331, a longer life is operationally logical for this account. Wastewater assets are exposed to more chemicals which will make these facilities last a shorter period of time than 80 years for water mains. Based on judgment and comparison to water facilities owned by CAW, this depreciation study recommends moving to a 60 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

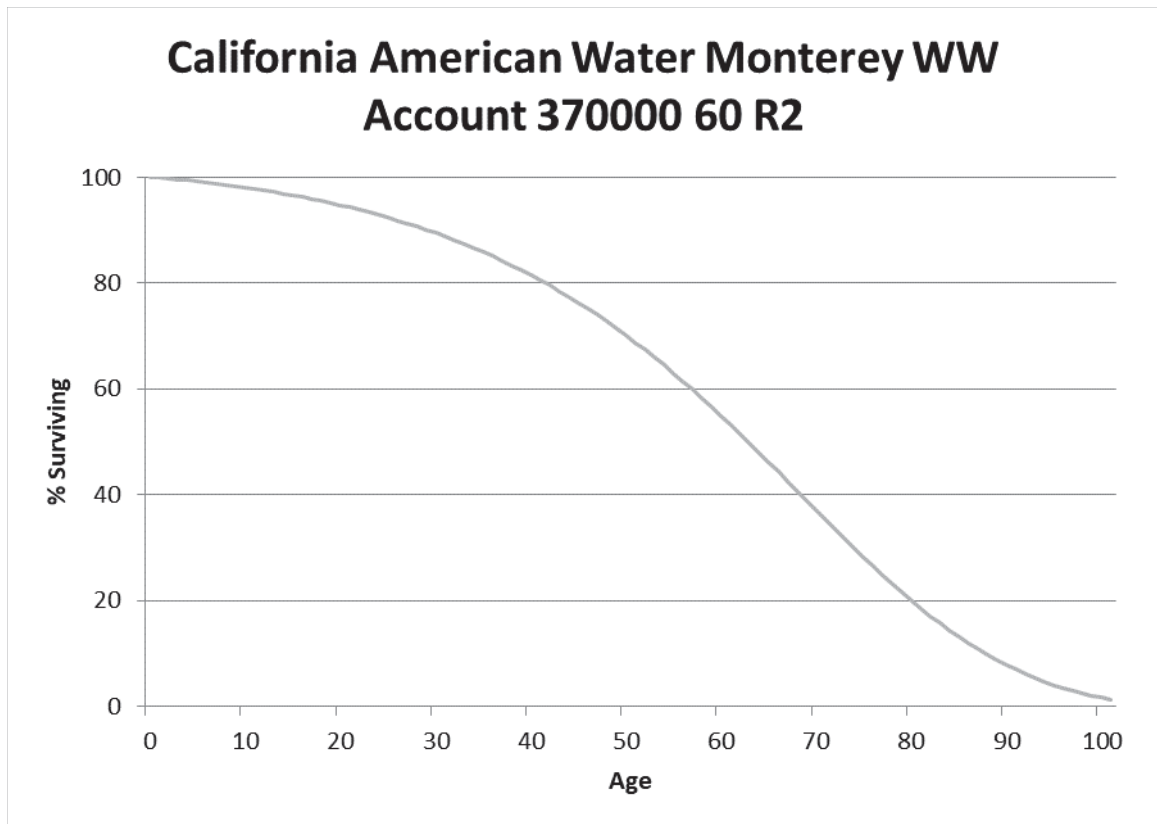
The approved net salvage for this account is 0 percent. Based on knowledge of the assets and judgment, this depreciation study recommends 0 percent net salvage for this account.

WASTEWATER Account 370000 Wastewater Receiving Wells

This account consists of wells at pumping stations or at other junction points along the collecting system, used for intercepting wastewater for clearing and screening, transfer to a pumping well, or otherwise further convey it along the collecting system to the treatment plant or point of final discharge.

LIFE ANALYSIS

The account balance is \$99 thousand for Sacramento and \$19 thousand Monterey WW for this account. The approved life characteristic is 20 R2. No retirements have occurred in this account since CAW acquired these assets in 2002, thus there is insufficient data available to perform life analysis. Since assets in this account are similar to Water Mains in Account 331, a longer life is operationally logical for this account. Wastewater assets are exposed to more chemicals which will make these facilities last a shorter period of time than 80 years for water mains. Based on input from Company SMEs, judgment and comparison to water facilities owned by CAW, this depreciation study recommends moving to 60 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

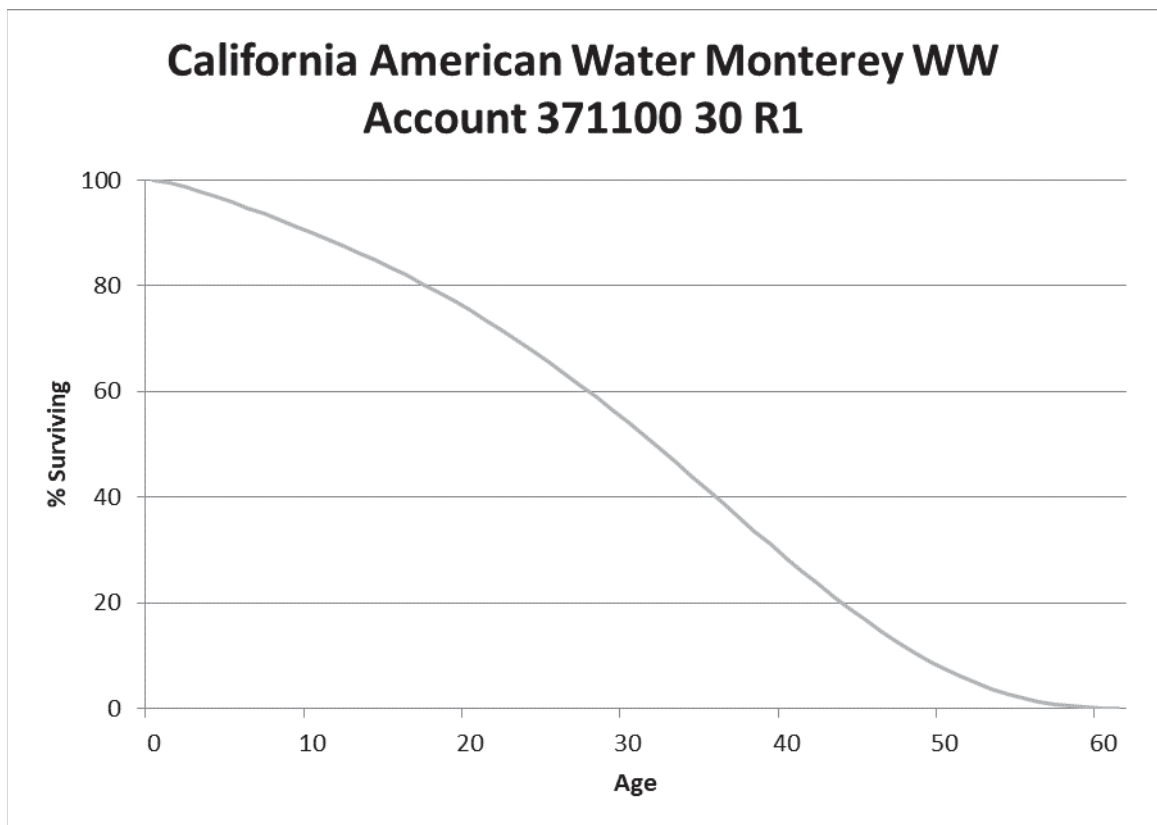
The approved net salvage for this account is negative 5 percent. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 371100 Wastewater Pumping Equipment Electric

This account consists of pumping equipment driven by electric power.

LIFE ANALYSIS

The account balance is \$1.7 million for this account. The approved life characteristic is 30 R1. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on judgment, and Company directive , this depreciation study recommends retention of a 30 R1 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

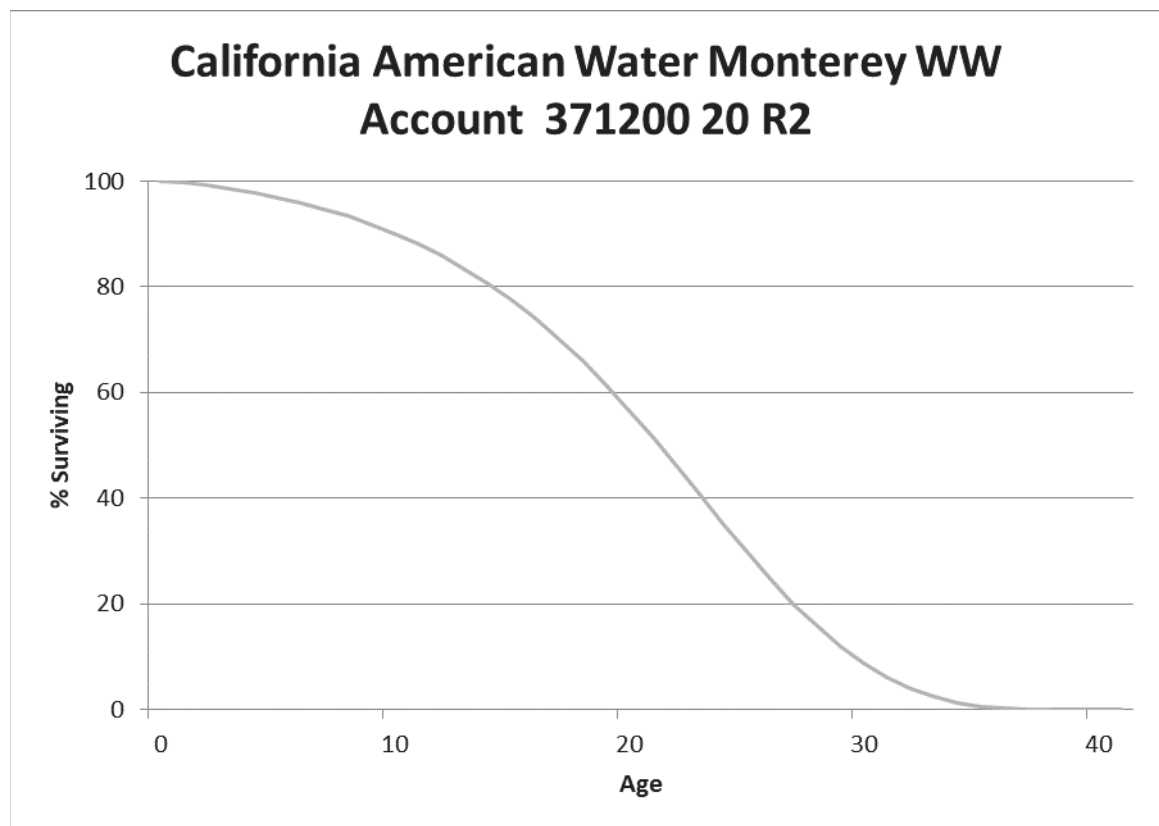
The approved net salvage for this account is negative 5 percent. In the most recent year, the 5- and 10-year moving averages show negative 18 and negative 27 percent respectively. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 371200 Wastewater Pumping Equipment Other

This account consists of pumping equipment not driven by electric power.

LIFE ANALYSIS

The account balance is \$21 thousand for this account. The approved life characteristic is 20 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retention of a 20 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

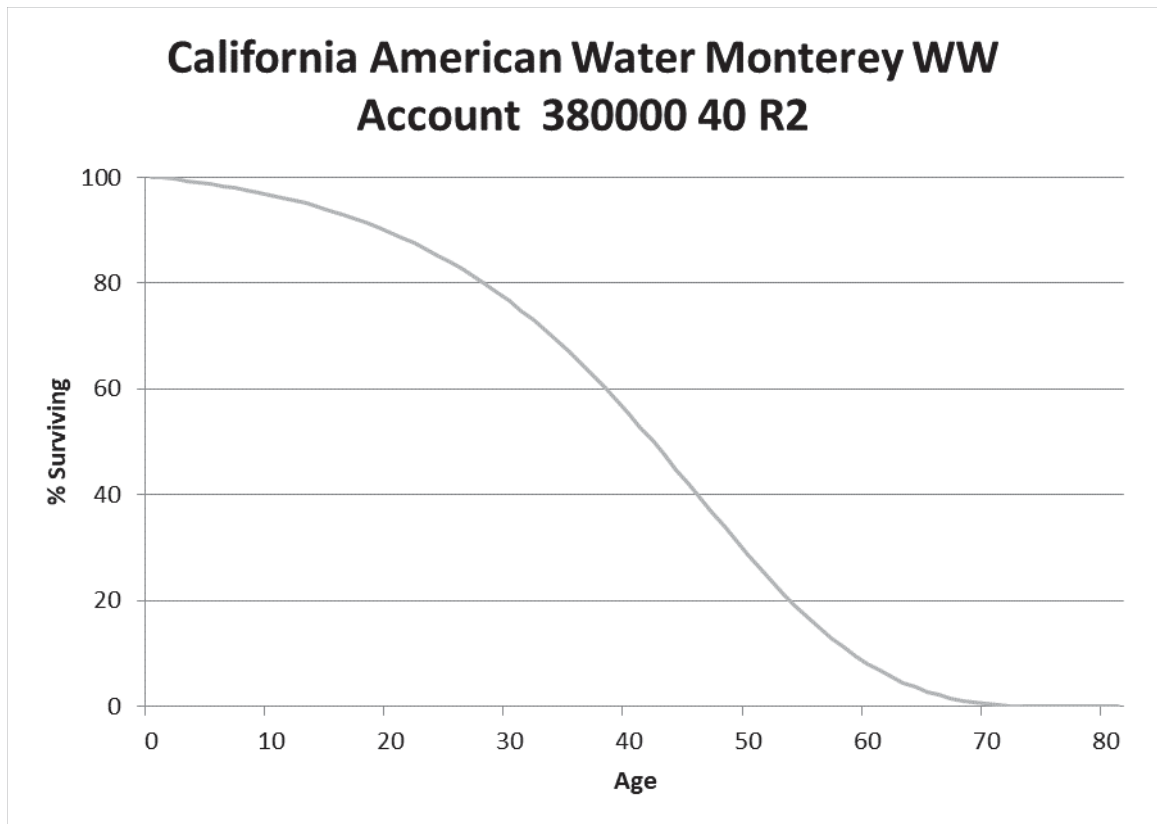
The approved net salvage for this account is 0 percent. In the most recent year, the overall net salvage percentage was negative 13 percent. To comply with the Company's request, , this depreciation study recommends retention of 0 percent net salvage for this account.

WASTEWATER Account 380000 Wastewater Treatment and Disposal Equipment

This account consists of apparatus equipment and other facilities used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse. Such assets are monitoring equipment, pipe, valves, media, and miscellaneous equipment.

LIFE ANALYSIS

The account balance is \$19 thousand for Sacramento and \$1.8 million in Monterey WW for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

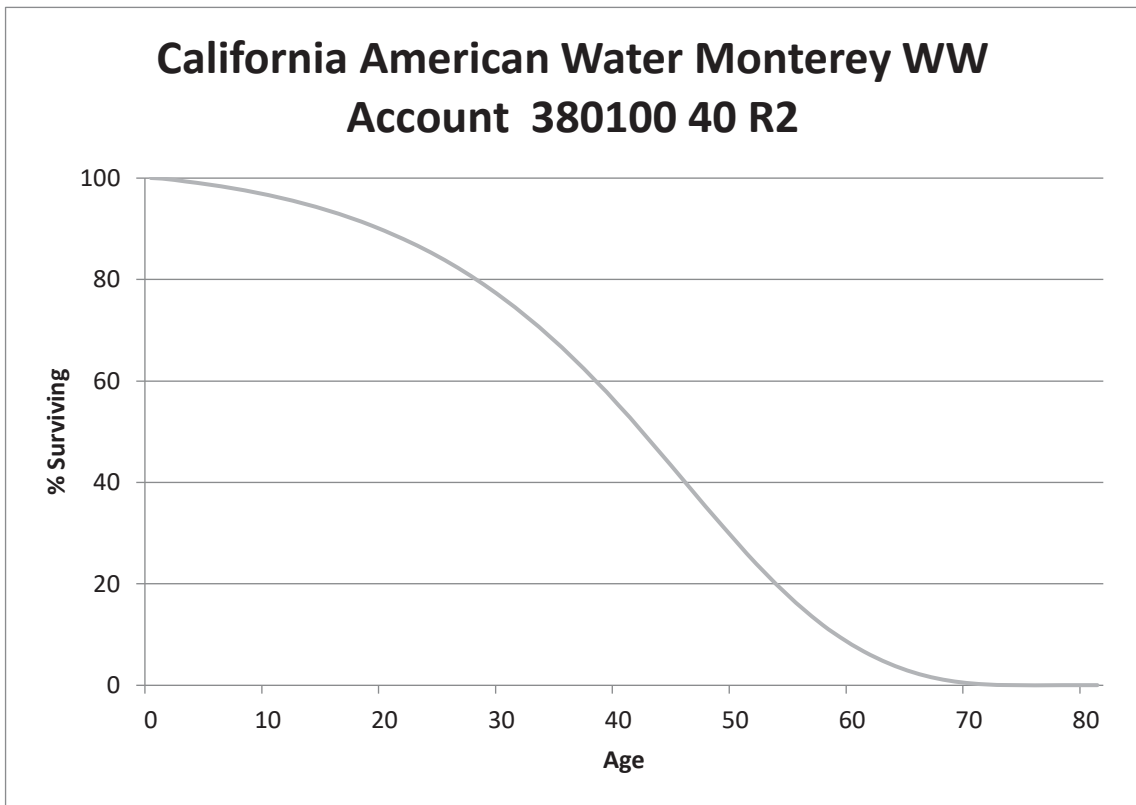
The approved net salvage for this account is 0 percent. In the most recent period, the 5-year and 10-year moving averages show negative 32 and negative 27 percent. To comply with the Company's request, this depreciation study recommends retention of 0 percent net salvage for this account.

WASTEWATER Account 380100 Wastewater Sediment Tanks and Accessories

This account consists of sediment tanks and clarification tanks used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse.

LIFE ANALYSIS

The account balance is \$2.5 million in Monterey WW for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

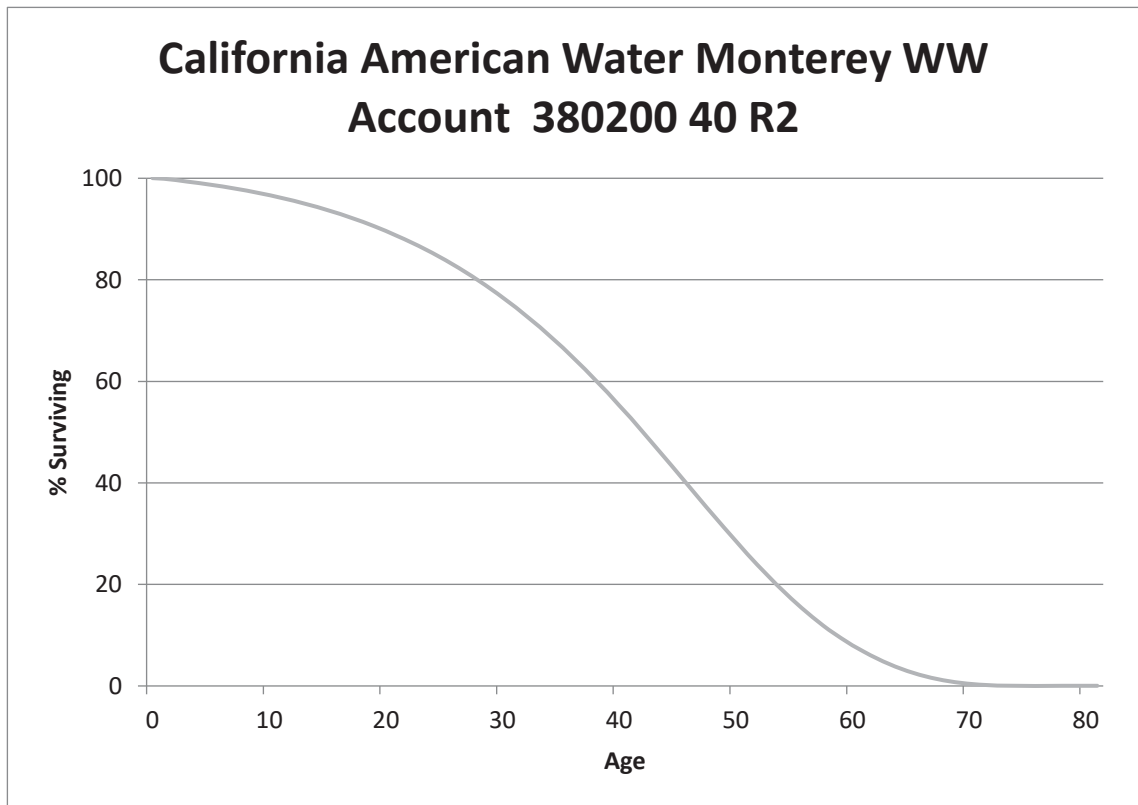
The approved net salvage for this account is negative 5 percent. To this point, there have been only a small number of retirements in this account. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 380200 Wastewater Treatment Sludge and Effluent Removal Equipment

This account consists of sludge and effluent removal equipment and other facilities used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse.

LIFE ANALYSIS

The account balance is \$44 thousand for Monterey WW. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

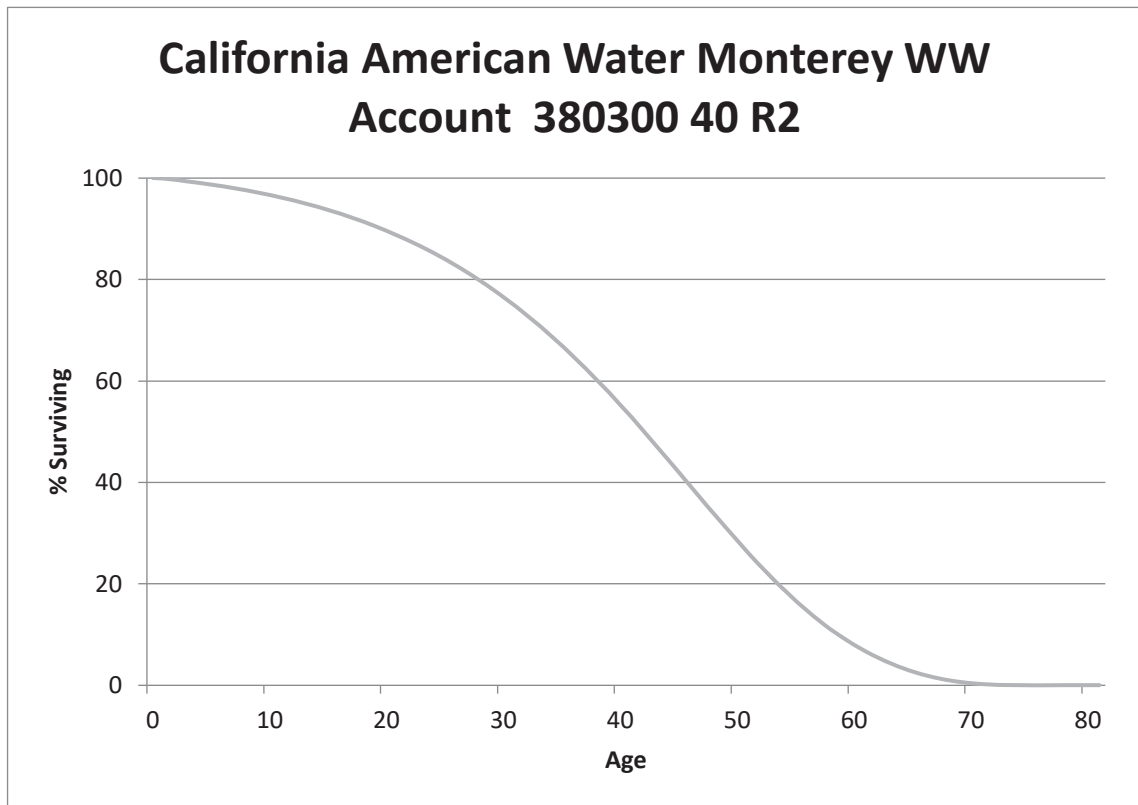
The approved net salvage for this account is negative 5 percent. In the most recent period, the 5-year and 10-year moving averages show negative 13 and negative 17 percent. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 380300 Wastewater Sludge Disposal Equipment

This account consists of apparatus equipment and other facilities used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse. These assets include air headers, holding tank, and sludge removal equipment

LIFE ANALYSIS

The account balance is \$307 thousand for Monterey WW. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

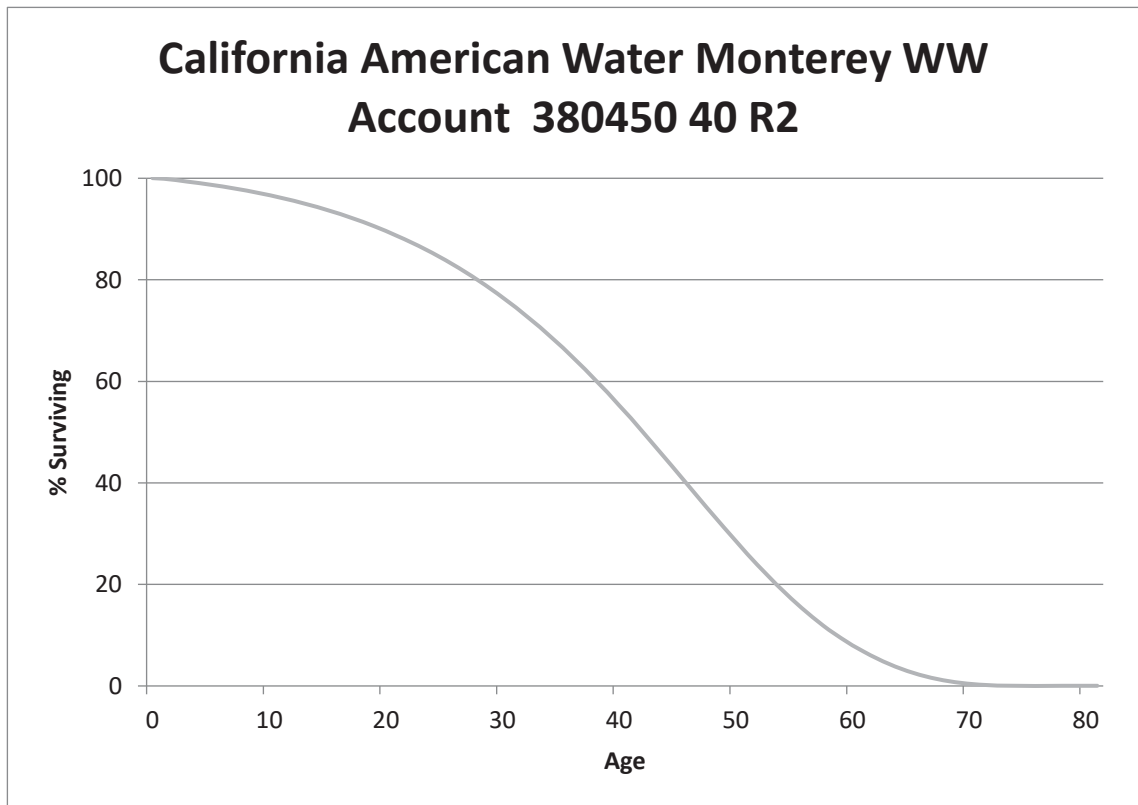
The approved net salvage for this account is negative 5 percent. In the most recent period, the 10-year and 20-year moving averages show negative 65 for both periods. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 380450 Wastewater Other Sewage Removal Equipment

This account consists of other sewage removal equipment used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse. These assets include pipe and fittings, filters, and holding tanks.

LIFE ANALYSIS

The account balance is \$845 thousand for Monterey WW. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

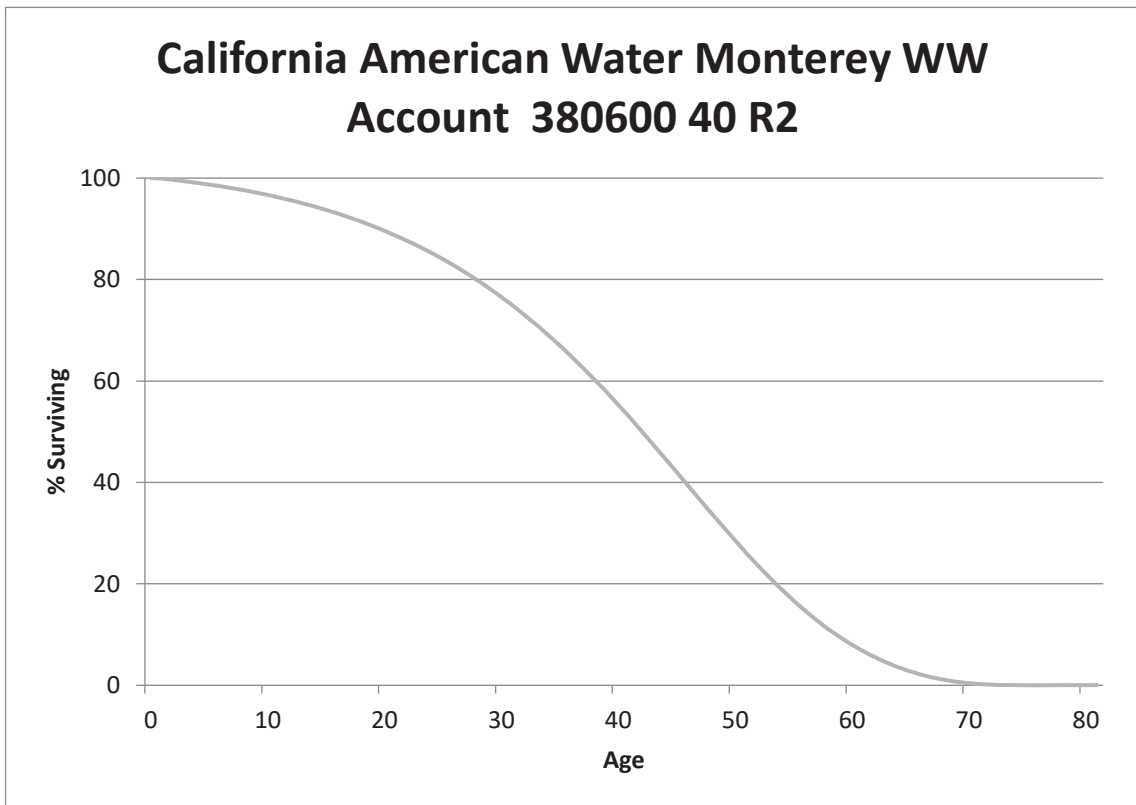
The approved net salvage for this account is negative 5 percent. The overall net salvage percentage shows negative 497 percent. To comply with the Company's request, , this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 380600 Wastewater Treatment and Disposal Equipment

This account consists of apparatus equipment and other facilities used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse. These assets include pipe and process equipment.

LIFE ANALYSIS

The account balance is \$9 thousand for Monterey WW. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

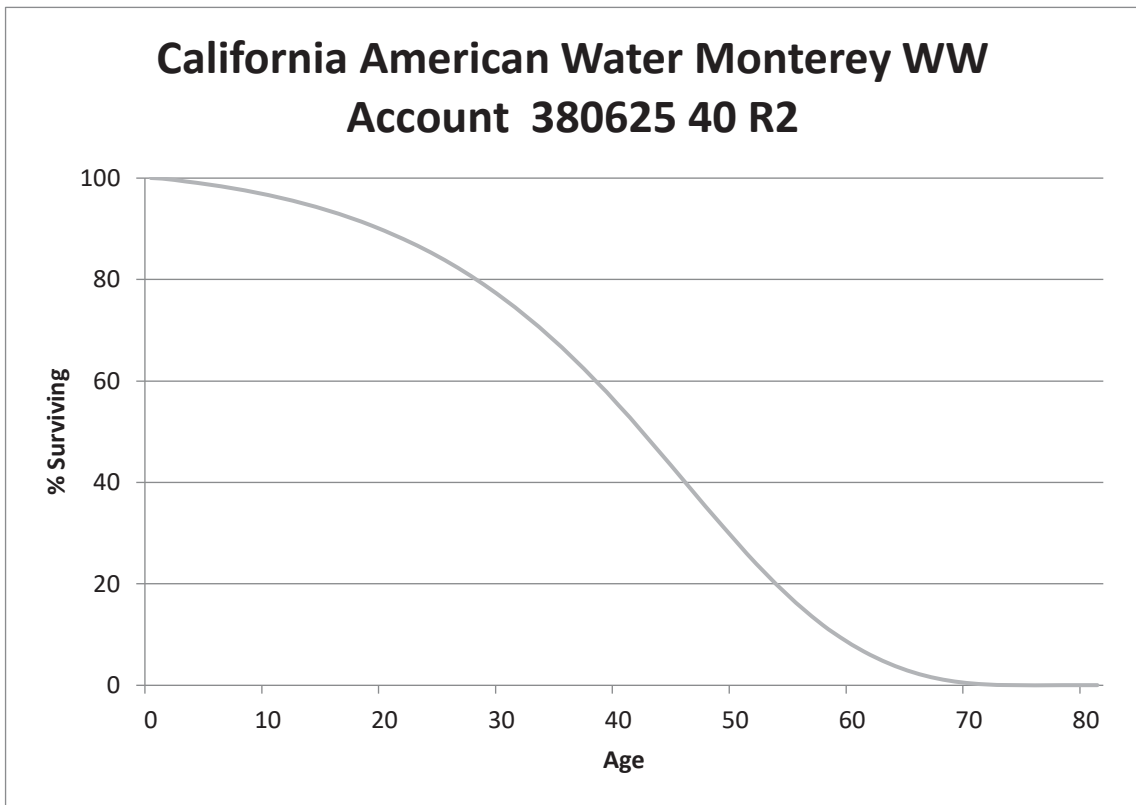
The approved net salvage for this account is negative 5 percent. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 380625 Wastewater General Treatment Equipment

This account consists of apparatus equipment and other facilities used for the treatment of wastewater, disposal of sewage wastes, and the treatment of effluent for reuse. The items in this account are sludge collection equipment and monitoring instruments.

LIFE ANALYSIS

The account balance is \$3.9 million in Monterey WW. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Company SMEs state that certain accounts related to treatment have the possibility of connection to regional treatment. For that reason, the Company requested that the existing life and net salvage parameters be retained for this account. Based on input from Company directive and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

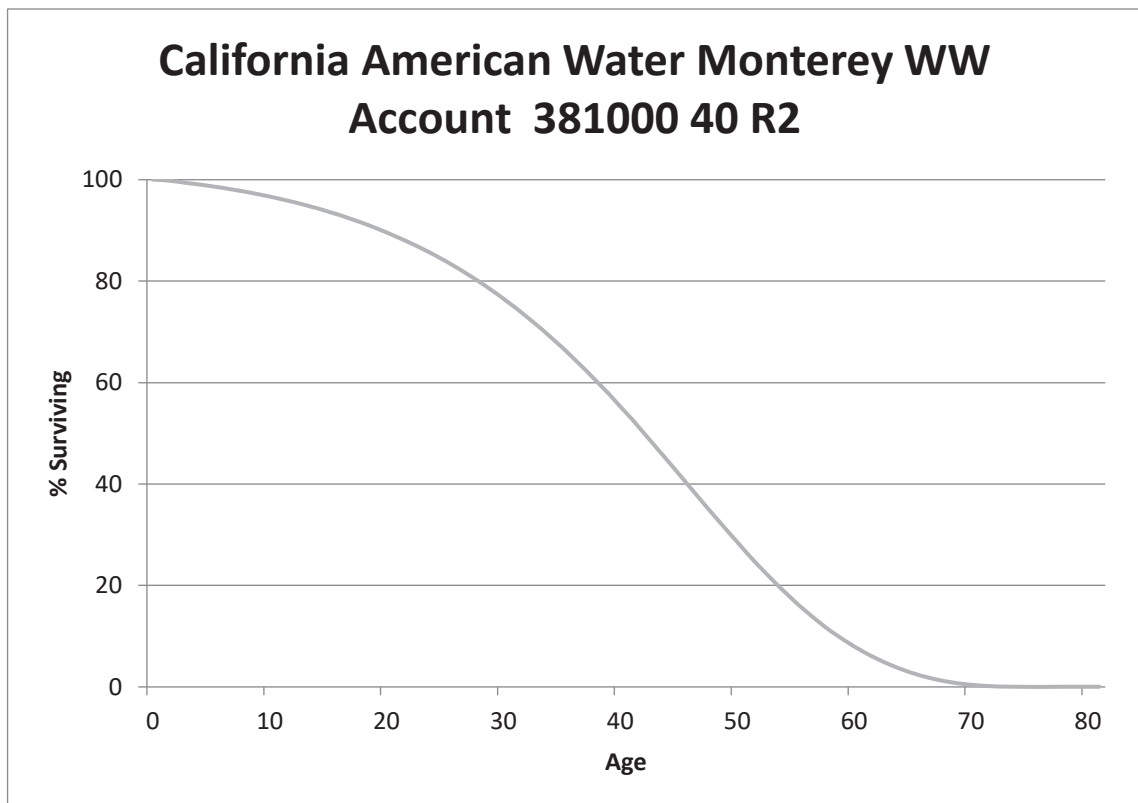
The approved net salvage for this account is negative 5 percent. To comply with the Company's request, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 381000 Wastewater Plant Sewers

This account consists of plant yard piping and appurtenances, and facilities required to dispose of treatment plant liquid effluent into the outfall sewer line.

LIFE ANALYSIS

The account balance is \$91 thousand for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Based on input from Company SMEs and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

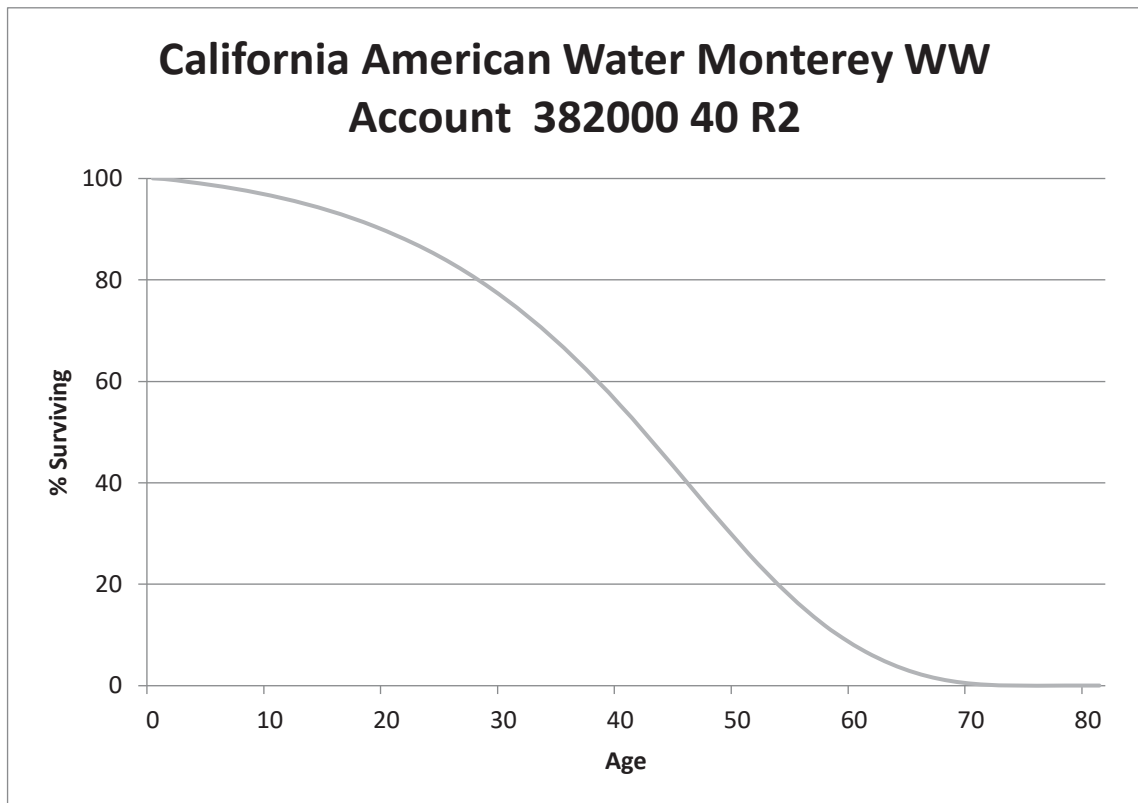
The approved net salvage for this account is negative 5 percent. The overall net salvage percent for this account is negative 13 percent. Based on knowledge of the assets and judgment, this depreciation study recommends retention of negative 5 percent net salvage for this account.

WASTEWATER Account 382000 Wastewater Outfall Sewer Lines

This account consists of sewer line carrying effluent from treatment facility to point of discharge, including headwall or outlet.

LIFE ANALYSIS

The account balance is \$22 thousand for this account. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Based on input from Company SMEs and judgment, this depreciation study recommends retaining a 40 R2 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

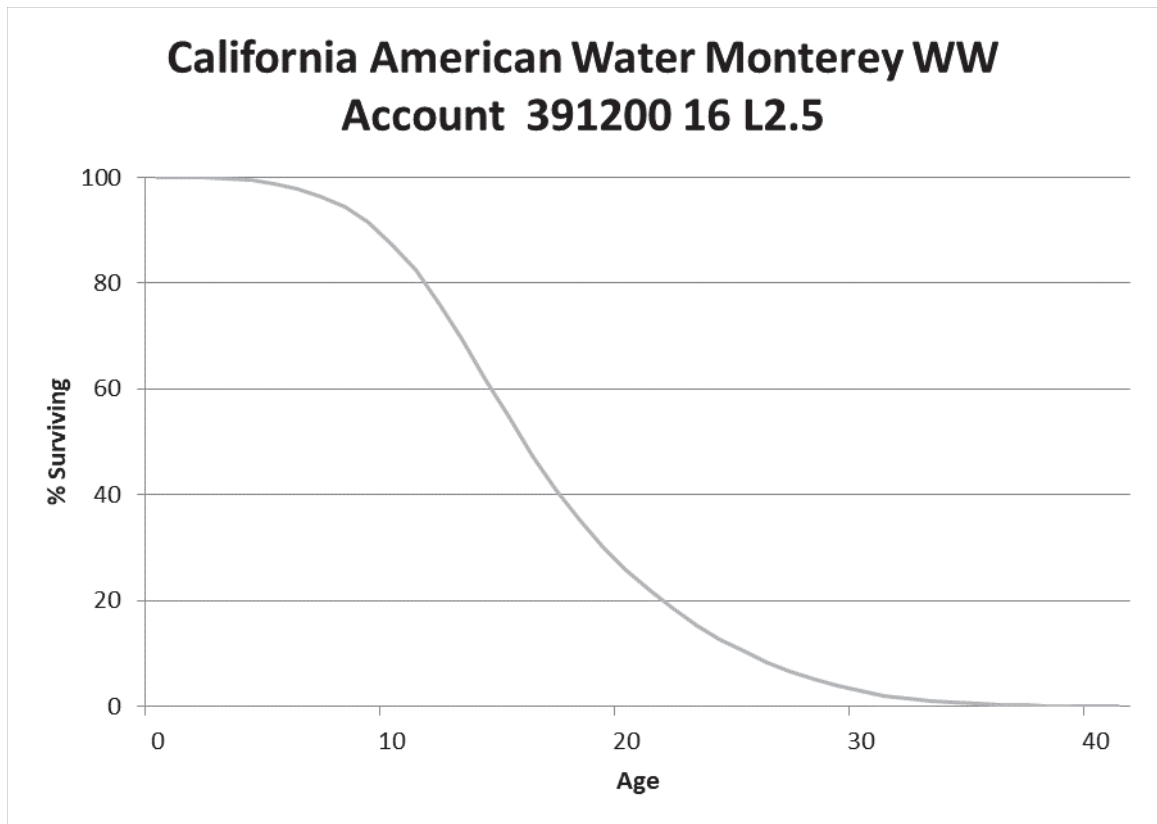
The approved net salvage for this account is negative 5 percent. There have been no retirements over the available history. Based on knowledge of the assets and activity in the 380 and 381 accounts, this depreciation study recommends retention of 5 percent net salvage for this account.

WASTEWATER Account 391200 Wastewater Trans Equip & Heavy Duty Trucks

This account consists of trucks used for heavy duty transporting equipment.

LIFE ANALYSIS

The account balance is \$409 thousand for this account. The approved life characteristic is 7 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Input from Company SMEs indicated that general plant assets should have a similar life between water and wastewater. The assets in this account consist of vehicles purchased in 2020 in the amount of \$72 thousand and a vacuum truck purchased in 2012 for \$337 thousand. The vacuum truck will have a longer life span than regular vehicles. Company SMEs estimate that asset will remain in service until 2030. Given the mix of assets in this account judgment and input from Company personnel, this depreciation study recommends an 16 L2.5 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

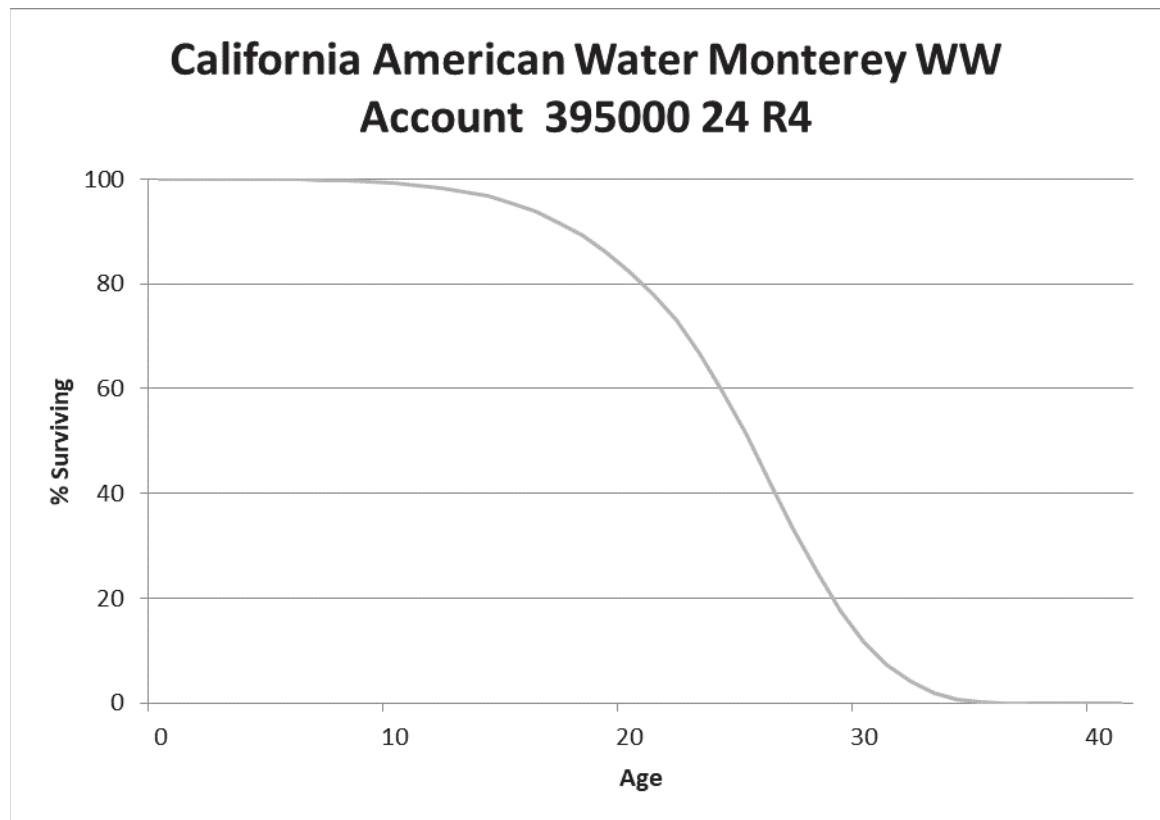
The approved net salvage for this account is 0 percent. There have been no retirements or net salvage on which to base an estimate. Given that the proposed net salvage estimate for water Account 341200 is positive 10 percent, that is a reasonable comparison to the wastewater assets. Based on knowledge of the assets and judgment, this depreciation study recommends positive 10 percent net salvage for this account.

WASTEWATER Account 395000 Wastewater Power Operated Equipment

This account consists of power operated equipment such as bulldozers or trenchers.

LIFE ANALYSIS

The account balance is \$20 thousand for this account. The approved life characteristic is 25 L0. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Input from Company SMEs indicated that general plant assets should have a similar life between water and wastewater. Given the recommendation for Account 345000 in the Water accounts, judgment, and comparison to water facilities owned by CAW, this depreciation study recommends a 24 R4 dispersion curve for this account. A generic curve shape is shown below.



NET SALVAGE

The approved net salvage for this account is positive 10 percent. There has been no retirement or net salvage history for this account. Based on knowledge of the assets and judgment, this depreciation study recommends moving to positive 15 percent net salvage for this account to match the same account in Water.

GENERAL PLANT AMORTIZED ACCOUNTS

General Plant Amortized Accounts 389-390, 393-394, 396-397

Adoption of Vintage Group Amortization

This study recommends the adoption of vintage group amortization for Accounts 389100, 389600, 390000, 393000, 394000, 396000, and 397000.

FERC adopted Accounting Release 15 in 1997 which contains the following criteria:

1. The individual classes of assets for which vintage year accounting is followed are high-volume, low-value items;
2. There is no change in existing retirement unit designations, for purposes of determining when expenditures are capital or expense;
3. The cost of the vintage groups is amortized to depreciation expense over their useful lives and there is no change in depreciation rates resulting from the adoption of the vintage year accounting;
4. Interim retirements are not recognized;
5. Salvage and removal cost relative to items in the vintage categories are included in the accumulated depreciation account and assigned to the oldest vintage first; and
6. Properties are retired from the affected accounts that, at the date of the adoption of vintage year accounting, meet or exceed the average service life of properties in that account.

A vintage year method of accounting for the general plant accounts that meets all of the foregoing requirements may be implemented without obtaining specific authorization from the Commission to do so.

To implement this amortization mechanism, it is necessary to first retire the assets whose age is longer than the recommended service life for each group. It will no longer be necessary for CAW to track the location and retirement of those assets. Those amounts are shown for each account in Appendix A-1. After those assets are retired, the remaining plant in service for each account will be amortized using the amortization rates shown in Appendix A-1. Annually,

assets that reach the average service life of each account will be retired. An additional accrual is also necessary for each plant account to make up the difference between the book depreciation reserve and the theoretical depreciation reserve. Since CAW plans to perform depreciation studies approximately every six years, a 6-year amortization period for reserve differences is used in this study. Those amounts will be accrued until the total reserve difference for each account shown in Appendix A-1 has been accumulated. For example, in Monterey WW, Account 39000 will require an annual accrual of \$781 annually for 6 years until the reserve difference of \$4,688 has been accumulated. At that point the additional annual accrual will cease. CAW proposes to implement amortization accounting consistent with Accounting Release 15 for the following general asset accounts.

GENERAL PLANT AMORTIZED ACCOUNTS

The following accounts are proposed for general plant amortization, which is discussed earlier in this report.

WASTEWATER Account 389100 Wastewater Oth Plt & Misc Eqp Intang

This account consists of costs to install all other intangible plant not provided for in the foregoing accounts

LIFE ANALYSIS AR15

These assets are booked in Monterey WW. The account balance is \$53 thousand for this account and \$0 after retirement of fully accrued assets. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Given the similarity between Water Account 339100 and these assets, the same recommendation for the Water account is proposed for this account. After reexamining the assets in this account, the life of this account is proposed to be 10 years with a SQ curve. Since this asset is software-related, a shorter life is indicated.

NET SALVAGE

The approved net salvage for this account is negative 5 percent. There has been no net salvage activity in this account. Given the similarity to Account 339100 in the Water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets and judgment, this depreciation study recommends 0 percent net salvage for this account.

WASTEWATER Account 389600 Wastewater Other P/E

This account consists of comprehensive planning studies.

LIFE ANALYSIS AR15

These assets are booked in Monterey WW. The account balance is \$79 thousand for this account and \$26 thousand after retirement of fully accrued assets. The approved life characteristic is 40 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Given the similarity between Water Account 339600 and these assets, the same recommendation the Water account is proposed for this account. After examining the assets in this account (which are intangible software), this depreciation study recommends a 7-year life with an SQ dispersion curve for this account.

NET SALVAGE

The approved net salvage for this account is 0 percent. Given the similarity to Account 339600 in the Water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets and judgment, this depreciation study recommends retention of 0 percent net salvage for this account.

WASTEWATER Account 390000 Wastewater Office Furniture and Equipment

This account consists of office furniture such as desks or chairs.

LIFE ANALYSIS AR15

These assets are booked in Monterey WW. The account balance is \$15 thousand for this account with all investment remaining in service after retirement of fully accrued assets. The approved life characteristic is 25 L2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Given the similarity between Water Account 340100 and these assets, the same recommendation for the Water account is proposed for this account. Based on judgment and comparison to water facilities owned by CAW, this depreciation study recommends a 21 SQ dispersion curve for this account.

NET SALVAGE

The approved net salvage for this account is 0 percent. Given the similarity to Account 340100 in the water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets and judgment, this depreciation study recommends 0 percent net salvage for this account.

WASTEWATER Account 393000 Wastewater Tool Shop & Garage Equipment

This account consists of tools and garage equipment.

LIFE ANALYSIS AR15

These assets are booked in Monterey WW. The account balance is \$37 thousand for this account, with all investment remaining in service after retirement of fully accrued assets. The approved life characteristic is not known. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Given the similarity between Water Account 343000 and these assets, the same recommendation for the Water account is proposed for this account. Based on judgment and comparison to water facilities owned by CAW, this depreciation study recommends a 20 SQ dispersion curve for this account.

NET SALVAGE

The approved net salvage for this account is not known. Given the similarity to Account 343000 in the water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets and judgment, this depreciation study recommends 0 percent net salvage for this account.

WASTEWATER Account 394000 Wastewater Laboratory Equipment

This account consists of laboratory equipment.

LIFE ANALYSIS AR 15

These assets are booked in Monterey WW. The account balance is \$50 thousand for this account with all investment remaining in service after retirement of fully accrued assets. The approved life characteristic is 25 L0. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. Given the similarity between Water Account 344000 and these assets, the same recommendation for the Water account is proposed for this account. Based on judgment and comparison to water facilities owned by CAW, this depreciation study recommends a 20 SQ dispersion curve for this account.

NET SALVAGE

The approved net salvage for this account is 0 percent. Given the similarity to Account 344000 in the water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets and judgment, this depreciation study recommends 0 percent net salvage for this account.

WASTEWATER Account 396000 Wastewater Communication Equipment

This account consists of communication equipment.

LIFE ANALYSIS AR 15

These assets are booked in Monterey WW. The account balance is \$62 thousand for this account with all investment remaining in service after retirement of fully accrued assets. The approved life characteristic is not known. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. This account will transition to vintage group amortization. Given the similarity between Water Accounts 346100 and 346200 and these assets, the same recommendation for the water account is proposed for this account. Given the rapid pace of technology for communication equipment and comparison to water facilities owned by CAW, this depreciation study recommends a 10-year life with an SQ dispersion curve for this account.

NET SALVAGE

The approved net salvage for this account is not known. Given the similarity to Accounts 346100 and 346200 in the water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets and judgment, this depreciation study recommends 0 percent net salvage for this account.

WASTEWATER Account 397000 Wastewater Miscellaneous Equipment

This account consists of miscellaneous general property such as instruments, lifting equipment, and other items.

LIFE ANALYSIS AR15

The account balance is \$14 thousand for Sacramento and \$56 thousand for Monterey WW for this account with all investment remaining in service after retirement of fully accrued assets. The approved life characteristic is 25 R2. Since the facilities were acquired in 2002, there is insufficient data available to perform life analysis. This account will transition to vintage group amortization. Given the similarity between Water Account 347000 and these assets, the same recommendation for the water account is proposed for this account. Based on judgment and comparison to water facilities owned by CAW in Account 347000, this depreciation study recommends a 17 SQ dispersion curve for this account.

NET SALVAGE

The approved net salvage for this account zero percent. After viewing the 10-year and 15-year moving averages, negative 9 and negative 3 percent are the net salvage percentages in the most recent period. Given the similarity to Account 347000 in the water group, the same net salvage parameter of 0 percent is proposed for this account. Based on knowledge of the assets, Company history, and judgment, this depreciation study recommends 0 percent net salvage for this account.

PRO FORMA PLANT

LEASEBACK VEHICLES

At the Company's request, we are including a new category of assets, leaseback vehicles. These are vehicles such as cars and or trucks that the Company has leased. At the end of the lease period, the Company purchases some of those assets.

LIFE ANALYSIS

The current plant balance in this account is \$44 thousand. At this time, there are thirty vehicles that have been added to this group. Each asset has a projected replace date. Based on the age of the assets and the plans to keep the group in service, this study recommends a life of 5 years. Given the assets in this group, this study recommends a 5 year life with a SQ dispersion for this account.

NET SALVAGE

At the time of retirement, these assets will be between 10 to 12 years old. After heavy usage, the Company does not estimate there will be any remaining value for these assets. Based on judgment, this study recommends 0 percent net salvage for this account.

APPENDIX A
Comparison of Existing vs Proposed Depreciation Rates

**CALIFORNIA AMERICAN WATER
CORONADO WATER DISTRICT
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Reallocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304500-Struct & Imp-General	137,638.67	7,689.92	-5.00%	(6,881.93)	136,830.68	38.70	3,535.36	2.57%
304600-Struct & Imp-Offices	989,669.38	176,277.62	-5.00%	(49,483.47)	862,875.23	15.75	54,802.03	5.54%
304700-Struct & Imp-Store,Shop,Gar	107,996.27	19,047.52	-5.00%	(5,399.81)	94,348.57	22.57	4,180.84	3.87%
311200-Pump Eqp Electric	131,286.92	136,519.61	-10.00%	(13,128.69)	7,896.00	6.22	1,268.51	0.97%
320100-WT Equip Non-Media	16,324.47	16,324.47	-10.00%	(1,632.45)	1,632.45	28.58	57.11	0.35%
330000-Dist Reservoirs & Standpipes	1,164,646.92	386,874.03	-25.00%	(291,161.73)	1,068,934.62	51.72	20,667.01	1.77%
331100-TD Mains 4in & Less	695,822.98	224,325.03	-60.00%	(417,493.79)	888,991.74	61.17	14,532.33	2.09%
331200-TD Mains 6in to 8in	10,503,301.21	3,676,008.34	-60.00%	(6,301,980.73)	13,129,273.60	59.56	220,431.33	2.10%
331300-TD Mains 10in to 16in	7,524,556.54	3,197,542.86	-60.00%	(4,514,733.92)	8,841,747.61	55.18	160,222.52	2.13%
331400-TD Mains 18in & Grtr	4,759,400.86	521,682.25	-60.00%	(2,855,640.52)	7,093,359.13	73.60	96,378.46	2.03%
333000-Services	12,528,805.75	4,058,138.92	-75.00%	(9,396,604.31)	17,867,271.14	47.03	379,915.52	3.03%
334100-Meters	4,266,508.54	1,522,030.15	-20.00%	(853,301.71)	3,597,780.10	13.06	275,569.63	6.46%
334200-Meter Installations	196.41	60.36	-10.00%	(19.64)	155.69	20.21	7.70	3.92%
334300- Meter Vaults	205,314.91	26,611.74	-10.00%	(20,531.49)	199,234.66	25.87	7,700.97	3.75%
335000-Hydrants	1,718,774.10	899,751.78	-55.00%	(945,325.76)	1,764,348.07	35.12	50,235.25	2.92%
341100-Trans Equip Lt Duty Trks	67,314.41	35,055.54	10.00%	6,731.44	25,527.42	1.61	15,843.37	23.54%
341200-Trans Equip Hvy Duty Trks	88,360.13	27,897.53	10.00%	8,836.01	51,626.59	5.31	9,726.29	11.01%
341400-Trans Equip Other	104,977.02	18,940.40	10.00%	10,497.70	75,538.92	7.75	9,750.45	9.29%
345000-Power Operated Equipment	123,002.74	51,794.65	15.00%	18,450.41	52,757.68	6.46	8,163.88	6.64%
	45,133,898.23	15,002,572.71		(25,628,804.38)	55,760,129.90		1,332,988.55	

**CALIFORNIA AMERICAN WATER
CORPORATE
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Reallocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304500-Struct & Imp-General	301,157.44	27,072.94	-5.00%	(15,057.87)	289,142.37	37.41	7,729.19	2.57%
	301,157.44	27,072.94		(15,057.87)	289,142.37		7,729.19	

**CALIFORNIA AMERICAN WATER
LARKFIELD WATER DISTRICT
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Reallocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304100-Struct & Imp-Supply	205,636.68	106,154.42	-10.00%	(20,563.67)	120,045.93	26.63	4,507.71	2.19%
304200-Struct & Imp-Pumping	224,544.37	43,011.48	-10.00%	(22,454.44)	203,987.33	30.45	6,698.39	2.98%
304300-Struct & Imp-Treatment	442,703.14	211,581.31	-10.00%	(44,270.31)	275,392.14	31.77	8,669.25	1.96%
304400-Struct & Imp-T&D	447,178.14	137,416.37	-10.00%	(44,717.81)	354,479.59	27.97	12,672.75	2.83%
304500-Struct & Imp-General	67,294.05	1,840.52	-5.00%	(3,364.70)	68,818.23	36.04	1,909.61	2.84%
307000-Wells & Springs	1,964,483.97	983,476.87	-5.00%	(98,224.20)	1,079,231.30	29.21	36,949.00	1.88%
309000-Supply Mains	172,839.30	90,917.76	-20.00%	(34,567.86)	116,489.40	51.68	2,253.95	1.30%
310000-Power Generation Equipment	5,366.90	3,669.13	-25.00%	(1,341.73)	3,039.50	11.80	257.59	4.80%
311200-Pump Eqp Electric	944,364.73	705,334.14	-10.00%	(94,436.47)	333,467.06	13.63	24,466.30	2.59%
311400-Pump Equip Hydraulic	1,841.61	782.99	-10.00%	(184.16)	1,242.78	19.93	62.37	3.39%
320100-WT Equip Non-Media	1,610,838.14	633,579.07	-10.00%	(161,083.81)	1,138,342.89	25.16	45,246.19	2.81%
320200-WT Equip Filter Media	135,666.43	86,819.44	-10.00%	(13,566.64)	62,413.63	4.79	13,030.29	9.60%
330000-Dist Reservoirs & Standpipes	1,472,218.46	486,792.59	-25.00%	(368,054.62)	1,353,480.49	56.64	23,898.10	1.62%
330100-Ground Level Facilities	7,895.60	2,242.98	-25.00%	(1,973.90)	7,626.52	59.69	127.78	1.62%
330200-Below Grade Facilities	207,003.68	28,946.10	-25.00%	(51,750.92)	229,808.50	67.46	3,406.49	1.65%
331001-TD Mains Not Classified	179,791.26	83,295.03	-60.00%	(107,874.76)	204,370.99	59.19	3,452.93	1.92%
331100-TD Mains 4in & Less	237,247.75	101,351.74	-60.00%	(142,348.65)	278,244.66	60.81	4,575.71	1.93%
331200-TD Mains 6in to 8in	2,980,299.15	1,515,588.61	-60.00%	(1,788,179.49)	3,252,890.03	58.57	55,541.10	1.86%
331300-TD Mains 10in to 16in	1,595,533.53	744,547.88	-60.00%	(957,320.12)	1,808,305.77	59.04	30,630.08	1.92%
332000-Fire Mains	17,961.39	2,683.24	-60.00%	(10,776.83)	26,054.98	73.29	355.51	1.98%
333000-Services	2,113,069.90	1,110,476.76	-75.00%	(1,584,802.43)	2,587,395.57	43.81	59,057.47	2.79%
334100-Meters	866,650.43	425,347.90	-20.00%	(173,330.09)	614,632.62	12.60	48,789.06	5.63%
335000-Hydrants	612,421.02	357,293.75	-55.00%	(336,831.56)	591,958.83	38.39	15,421.28	2.52%
341200-Trans Equip Hvy Duty Trks	477.00	429.30	10.00%	47.70	0.00	3.00	0.00	0.00%
345000-Power Operated Equipment	57,826.74	2,468.77	15.00%	8,674.01	46,683.96	17.43	2,678.27	4.63%
	16,571,153.37	7,866,048.14		(6,053,297.45)	14,758,402.69		404,657.18	

**CALIFORNIA AMERICAN WATER
LOS ANGELES WATER DISTRICT
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Reallocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304100-Struct & Imp-Supply	1,055,710.01	67,837.58	-10.00%	(105,571.00)	1,093,443.44	41.65	26,252.88	2.49%
304200-Struct & Imp-Pumping	1,849,559.38	364,710.15	-10.00%	(184,955.94)	1,669,805.17	28.67	58,240.60	3.15%
304300-Struct & Imp-Treatment	395,437.61	139,430.06	-10.00%	(39,543.76)	295,551.32	39.27	7,526.99	1.90%
304400-Struct & Imp-T&D	101,365.08	21,334.33	-10.00%	(10,136.51)	90,167.26	19.77	4,561.54	4.50%
304500-Struct & Imp-General	468,144.38	36,376.43	-5.00%	(23,407.22)	455,175.17	28.05	16,226.60	3.47%
304600-Struct & Imp Offices	354,252.38	71,313.65	-5.00%	(17,712.62)	300,651.35	10.02	30,009.04	8.47%
304700-Struct & Imp-Store,Shop,Gar	277,051.53	81,622.93	-5.00%	(13,852.58)	209,281.18	7.04	29,722.06	10.73%
305000-Collect & Impound Reservoirs	55,920.26	16,518.86	0.00%	0.00	39,401.40	47.45	830.41	1.48%
306000-Lake, River & Other Intakes	350,312.98	22,292.46	0.00%	0.00	328,020.52	37.67	8,707.01	2.49%
307000-Wells & Springs	15,727,891.28	4,751,507.73	-20.00%	(3,145,578.26)	14,121,961.81	34.60	408,098.89	2.59%
309000-Supply Mains	292,088.19	89,837.42	-25.00%	(73,022.05)	275,272.82	62.00	4,439.84	1.52%
310000-Power Generation Equipment	5,939.90	3,406.41	-10.00%	(593.99)	3,127.48	9.88	316.58	5.33%
311200-Pump Equip Electric	13,655,859.00	5,560,316.16	-10.00%	(1,365,585.90)	9,461,128.74	17.54	539,260.49	3.95%
311540-Pump Equip TD	3,524.20	1,222.73	-10.00%	(352.42)	2,653.89	19.09	139.01	3.94%
320100-WT Equip Non-Media	2,336,663.94	714,575.62	-10.00%	(233,666.39)	1,855,754.72	29.15	63,669.04	2.72%
320190-WT Equip-Basin,Clearwell	157.68	140.36	-10.00%	(15.77)	33.09	16.44	2.01	1.28%
320193-WT Equip-Chemical Feed	108.00	96.13	-10.00%	(10.80)	22.67	16.44	1.38	1.28%
330000-Dist Reservoirs & Standpipes	10,101,866.96	2,680,953.24	-25.00%	(2,525,466.74)	9,946,380.46	57.58	172,742.19	1.71%
331001-TD Mains Not Classified	3,411,676.24	514,403.95	-60.00%	(2,047,005.74)	4,944,278.03	71.75	68,907.58	2.02%
331100-TD Mains 4in & Less	3,255,862.58	793,690.88	-60.00%	(1,953,517.55)	4,415,689.25	66.67	66,236.63	2.03%
331200-TD Mains 6in to 8in	27,033,566.59	9,201,650.25	-60.00%	(16,220,139.95)	34,052,056.30	61.38	554,766.16	2.05%
331300-TD Mains 10in to 16in	21,365,402.71	7,346,918.21	-60.00%	(12,819,241.63)	26,837,726.12	61.19	438,596.98	2.05%
331400-TD Mains 18in & Grtr	1,542,944.69	142,785.03	-60.00%	(925,766.81)	2,325,926.48	74.94	31,038.04	2.01%
333000-Services	32,398,804.06	9,678,389.81	-75.00%	(24,299,103.05)	47,019,517.29	48.79	963,614.12	2.97%
334100-Meters	9,106,804.10	3,516,190.21	-20.00%	(1,821,360.82)	7,411,974.71	12.96	571,917.59	6.28%
334102-Meters Greater than 1"	57,028.42	2,119.03	-20.00%	(11,405.68)	66,315.08	19.32	3,432.02	6.02%
334200-Meter Installations	456,575.02	149,200.20	-10.00%	(45,657.50)	353,032.32	20.25	17,433.83	3.82%
334300- Meter Vaults	8,642.52	2,372.46	-10.00%	(864.25)	7,134.31	21.81	327.12	3.79%
335000-Hydrants	5,661,568.96	1,922,234.67	-55.00%	(3,113,862.93)	6,853,197.22	44.10	155,398.70	2.74%
341100-Trans Equip Lt Duty Trks	26,483.40	440.48	10.00%	2,648.34	23,394.58	10.50	2,227.85	8.41%
341200-Trans Equip Hvy Duty Trks	69,100.38	10,665.49	10.00%	6,910.04	51,524.85	5.85	8,800.67	12.74%
341300-Trans Equip Autos	71,347.25	15,238.89	10.00%	7,134.73	48,973.63	3.88	12,622.64	17.69%
345000-Power Operated Equipment	33,344.81	4,778.09	15.00%	5,001.72	23,565.00	12.96	1,817.62	5.45%
	151,531,004.49	47,924,569.88		(70,975,703.03)	174,582,137.64		4,267,884.13	

**CALIFORNIA AMERICAN WATER
MONTEREY WATER DISTRICT
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Allocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304100-Struct & Imp-Supply	4,755,118.77	1,092,646.83	-10.00%	(475,511.88)	4,137,983.81	37.30	110,936.06	2.33%
304200-Struct & Imp-Pumping	6,303,387.94	1,190,887.74	-10.00%	(630,338.79)	5,742,838.99	27.76	206,895.01	3.28%
304300-Struct & Imp-Treatment	10,095,454.55	5,403,905.39	-10.00%	(1,009,545.46)	5,701,094.61	33.68	169,258.63	1.68%
304400-Struct & Imp-T&D	944,359.39	270,037.39	-10.00%	(94,435.94)	768,757.94	18.84	40,795.42	4.32%
304500-Struct & Imp-General	1,783,732.29	197,486.09	-5.00%	(89,186.61)	1,675,432.81	33.45	50,085.26	2.81%
304600-Struct & Imp-Offices	229,863.85	21,791.49	-5.00%	(11,493.19)	219,565.56	17.34	12,662.26	5.51%
304700-Struct & Imp-Store,Shop,Gar	166,313.71	36,605.42	-5.00%	(8,315.69)	138,023.97	17.86	7,727.47	4.65%
304800-Struct & Imp-Misc	115,947.95	22,530.30	0.00%	0.00	93,417.65	12.50	7,474.34	6.45%
305000-Collect & Impound Reservoirs	1,815,477.81	1,594,312.48	0.00%	0.00	221,165.33	21.23	10,418.92	0.57%
306000-Lake, River & Other Intakes	57,852.15	13,448.29	0.00%	0.00	44,403.86	33.23	1,336.35	2.31%
307000-Wells & Springs	14,618,453.92	6,743,414.48	-20.00%	(2,923,690.78)	10,798,730.22	32.34	333,887.86	2.28%
309000-Supply Mains	4,968,687.76	2,216,223.37	-25.00%	(1,242,171.94)	3,994,636.33	59.07	67,625.12	1.36%
310000-Power Generation Equip	1,889,699.63	688,954.20	-10.00%	(188,969.96)	1,389,715.39	13.21	105,164.62	5.57%
311200-Pump Eqp Electric	22,000,035.92	5,665,229.45	-10.00%	(2,200,003.59)	18,534,810.06	20.10	922,015.57	4.19%
311300-Pump Eqp Diesel	62,926.20	19,892.41	-10.00%	(6,292.62)	49,326.41	18.30	2,694.71	4.28%
311400-Pump Eqp Hydraulic	195,421.00	40,542.39	-10.00%	(19,542.10)	174,420.71	21.64	8,061.07	4.12%
311500-Pump Eqp Other	411,863.96	76,868.67	-10.00%	(41,186.40)	376,181.69	22.28	16,887.23	4.10%
320100-WT Equip Non-Media	20,818,680.60	10,986,715.37	-10.00%	(2,081,868.06)	11,913,833.29	24.17	492,833.22	2.37%
320200-WT Equip Filter Media	539,159.71	316,924.00	-10.00%	(53,915.97)	276,151.68	11.05	24,987.63	4.63%
330000-Dist Reservoirs & Standpipes	18,067,998.03	5,518,641.88	-25.00%	(4,516,999.51)	17,066,355.65	57.64	296,079.70	1.64%
330200-Ground Level Tanks	8,629,286.32	680,825.24	-25.00%	(2,157,321.58)	10,105,782.66	70.52	143,311.82	1.66%
331001-TD Mains Unclassified	114,007.79	31,667.43	-60.00%	(68,404.67)	150,745.03	66.84	2,255.15	1.98%
331100-TD Mains 4 in & Less	9,392,875.67	2,455,908.32	-60.00%	(5,635,725.40)	12,572,692.75	67.62	185,941.36	1.98%
331200-TD Mains 6 to 8 in	66,632,641.60	20,638,854.57	-60.00%	(39,979,584.96)	85,973,371.99	65.33	1,315,977.64	1.97%
331300-TD Mains 10 to 16 in	33,201,629.28	15,343,552.99	-60.00%	(19,920,977.57)	37,779,053.85	58.11	650,130.97	1.96%
331400-TD Mains 18 in & greater	68,822,186.97	4,863,327.72	-60.00%	(41,293,312.18)	105,252,171.44	76.65	1,373,094.83	2.00%
333000-Services	32,558,617.39	13,428,929.04	-75.00%	(24,418,963.04)	43,548,651.40	46.61	934,417.08	2.87%
334100-Meters	12,114,276.94	4,982,644.94	-20.00%	(2,422,855.39)	9,554,487.38	13.33	716,819.15	5.92%
334300-Meter Vaults	734,401.00	46,258.32	-10.00%	(73,440.10)	761,582.78	28.37	26,841.98	3.65%
335000-Hydrants	10,136,996.83	3,727,396.93	-55.00%	(5,575,348.26)	11,984,948.16	44.97	266,527.16	2.63%
341100-Trans Equip Lt Duty Trks	71,416.64	1,510.59	10.00%	7,141.66	62,764.39	10.50	5,977.00	8.37%
341200-Trans Equip Hvy Duty Trks	115,188.76	2,438.20	10.00%	11,518.88	101,231.68	10.50	9,640.54	8.37%
341400-Trans Equip Other	130,566.08	30,261.34	10.00%	13,056.61	87,248.14	5.53	15,771.41	12.08%
345000-Power Operated Equipment	156,297.69	10,093.98	15.00%	23,444.65	122,759.05	20.48	5,994.04	3.84%
	352,650,824.10	108,360,727.25		(157,084,239.84)	401,374,336.69		8,540,526.60	

**CALIFORNIA AMERICAN WATER
SACRAMENTO WATER DISTRICT
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Allocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304100-Struct & Imp-Supply	7,567,792.28	1,835,040.79	-10.00%	(756,779.23)	6,489,530.72	34.83	186,335.57	2.46%
304200-Struct & Imp-Pumping	15,028,298.80	3,308,275.91	-10.00%	(1,502,829.88)	13,222,852.77	28.90	457,546.81	3.04%
304300-Struct & Imp-Treatment	10,321,971.66	3,700,014.66	-10.00%	(1,032,197.17)	7,654,154.17	39.58	193,386.33	1.87%
304400-Struct & Imp-T&D	1,186,114.63	387,484.29	-10.00%	(118,611.46)	917,241.80	18.08	50,726.39	4.28%
304500-Struct & Imp-General	7,044,913.33	1,454,009.14	-5.00%	(352,245.67)	5,943,149.85	30.12	197,314.94	2.80%
304700-Struct & Imp-Store,Shop,Gar	308,573.18	41,009.88	-5.00%	(15,428.66)	282,991.96	24.54	11,533.82	3.74%
306000-Lake, River & Other Intakes	12,734.88	6,964.69	0.00%	0.00	5,770.19	18.69	308.70	2.42%
307000-Wells & Springs	26,084,194.76	7,549,785.03	-20.00%	(5,216,838.95)	23,751,248.68	34.16	695,299.16	2.67%
309000-Supply Mains	6,722,161.33	1,000,890.41	-25.00%	(1,680,540.33)	7,401,811.26	70.72	104,666.57	1.56%
310000-Power Generation Equip	2,906,544.68	775,777.49	-10.00%	(290,654.47)	2,421,421.66	15.07	160,625.37	5.53%
311200-Pump Eqp Electric	37,675,010.59	16,877,304.68	-10.00%	(3,767,501.06)	24,565,206.97	18.23	1,347,630.34	3.58%
311400-Pump Eqp Hydraulic	1,219,605.69	375,533.52	-10.00%	(121,960.57)	966,032.74	21.25	45,449.71	3.73%
311500-Pump Eqp Other	1,138,298.07	260,125.94	-10.00%	(113,829.81)	992,001.93	18.66	53,152.75	4.67%
320100-WT Equip Non-Media	32,030,607.66	11,617,938.73	-10.00%	(3,203,060.77)	23,615,729.70	28.06	841,646.65	2.63%
320193-WT Equip-Chemical Feed	2,627,525.62	822,351.56	-10.00%	(262,752.56)	2,067,926.62	6.00	344,654.44	13.12%
320200-WT Equip Filter Media	1,675,291.71	707,538.86	-10.00%	(167,529.17)	1,135,282.02	12.92	87,853.96	5.24%
330000-Dist Reservoirs & Standpipes	6,145,879.80	2,233,489.96	-25.00%	(1,536,469.95)	5,448,859.79	54.69	99,626.68	1.62%
330002-Tank Original Painting	24,605.54	4,134.20	-25.00%	(6,151.39)	26,622.73	65.67	405.40	1.65%
330003-Tank Repainting	609,460.69	102,574.99	-25.00%	(152,365.17)	659,250.87	65.65	10,041.26	1.65%
330100-Ground Level Facilities	4,246,436.21	502,670.01	-25.00%	(1,061,609.05)	4,805,375.25	69.17	69,469.13	1.64%
330200-Ground Level Tanks	13,039,378.72	1,174,211.27	-25.00%	(3,259,844.68)	15,125,012.13	69.95	216,216.05	1.66%
330300-Below Ground Tanks	133,377.57	29,909.10	-25.00%	(33,344.39)	136,812.86	63.58	2,151.86	1.61%
331001-TD Mains Unclassified	16,524,913.88	6,347,978.39	-60.00%	(9,914,948.33)	20,091,883.82	60.38	332,763.35	2.01%
331100-TD Mains 4 in & Less	41,357,581.78	26,016,995.40	-60.00%	(24,814,549.07)	40,155,135.45	50.91	788,800.78	1.91%
331200-TD Mains 6 to 8 in	25,781,432.91	5,373,290.16	-60.00%	(15,468,859.75)	35,877,002.50	70.38	509,797.45	1.98%
331300-TD Mains 10 to 16 in	27,014,181.20	5,535,146.49	-60.00%	(16,208,508.72)	37,687,543.43	70.53	534,332.27	1.98%
331400-TD Mains 18 in & greater	6,686,782.25	1,083,282.73	-60.00%	(4,012,069.35)	9,615,568.87	72.50	132,622.34	1.98%
332000-Fire Mains	20,424.51	5,270.51	-60.00%	(12,254.71)	27,408.70	68.06	402.72	1.97%
333000-Services	33,891,218.23	17,138,575.43	-75.00%	(25,418,413.67)	42,171,056.47	43.95	959,545.52	2.83%
334100-Meters	21,763,320.91	13,767,749.30	-20.00%	(4,352,664.18)	12,348,235.79	9.92	1,245,307.45	5.72%
334200-Meter Installations	33,483,638.61	12,036,577.70	-10.00%	(3,348,363.86)	24,795,424.77	20.93	1,184,875.08	3.54%
335000-Hydrants	11,828,693.51	6,662,902.05	-55.00%	(6,505,781.43)	11,671,572.89	38.43	303,703.97	2.57%
341100-Trans Equip Lt Duty Trks	911,748.46	527,101.43	10.00%	91,174.85	293,472.18	2.17	135,477.47	14.86%
341200-Trans Equip Hvy Duty Trks	151,470.75	0.00	10.00%	15,147.08	136,323.68	9.52	14,319.98	9.45%
345000-Power Operated Equipment	431,238.88	150,590.77	15.00%	64,685.83	215,962.28	9.81	22,010.91	5.10%
354400-WW Struct & Imp Treatment	2,877,903.22	348.38	-10.00%	(287,790.32)	3,165,345.16	42.54	74,407.08	2.59%
361100-WW Collecting Mains	366,515.37	81,031.99	-10.00%	(36,651.54)	322,134.92	40.81	7,893.53	2.15%
370000-WW Receiving Wells	98,936.92	35,143.74	-10.00%	(9,893.69)	73,686.87	41.99	1,754.96	1.77%
380000-WW TD Equipment	18,371.43	1,407.46	-10.00%	(1,837.14)	18,801.11	34.78	540.65	2.94%
397000-WW Misc Equipment	14,710.66	1,116.00	0.00%	0.00	13,594.66	13.50	1,007.01	6.85%
Total	400,971,860.88	149,531,543.06		(134,874,122.39)	386,314,440.21		11,425,604.41	

* Zero remaining life- Use 6 year recovery period as proposed for amortized assets

**CALIFORNIA AMERICAN WATER
VENTURA COUNTY WATER DISTRICT
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Allocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
304100-Struct & Imp-Supply	283,321.68	24,261.46	-10.00%	(28,332.17)	287,392.39	40.56	7,086.14	2.50%
304200-Struct & Imp-Pumping	1,029,987.44	283,573.33	-10.00%	(102,998.74)	849,412.86	29.21	29,078.87	2.82%
304400-Struct & Imp-T&D	444,559.28	105,619.28	-10.00%	(44,455.93)	383,395.93	19.81	19,353.74	4.35%
304500-Struct & Imp-General	743,270.67	55,329.60	-5.00%	(37,163.53)	725,104.61	36.62	19,801.65	2.66%
304600-Struct & Imp-Offices	243,298.30	46,803.52	-5.00%	(12,164.92)	208,659.70	14.05	14,855.05	6.11%
304620-Struct & Imp-Leasehold	14,135.28	3,196.59	-5.00%	(706.76)	11,645.46	18.32	635.59	4.50%
304700-Struct & Imp-Store,Shop,Gar	2,069.59	1,033.66	-5.00%	(103.48)	1,139.41	4.21	270.70	13.08%
306000-Lake, River & Other Intakes	910,275.53	578,050.34	0.00%	0.00	332,225.19	14.47	22,963.56	2.52%
309000-Supply Mains	424,085.22	75,146.27	-25.00%	(106,021.31)	454,960.26	68.60	6,632.00	1.56%
311200-Pump Eqp Electric	5,236,398.70	3,183,690.54	-10.00%	(523,639.87)	2,576,348.03	17.75	145,130.52	2.77%
311400-Pump Eqp Hydraulic	431.00	206.85	-10.00%	(43.10)	267.25	19.93	13.41	3.11%
320100-WT Equip Non-Media	97,686.20	37,764.21	-10.00%	(9,768.62)	69,690.61	27.66	2,519.82	2.58%
330000-Dist Reservoirs & Standpipes	27,012,302.73	8,165,186.24	-25.00%	(6,753,075.68)	25,600,192.17	57.57	444,701.66	1.65%
330200-Ground Level Tanks	1,112,647.29	139,807.45	-25.00%	(278,161.82)	1,251,001.66	67.75	18,464.06	1.66%
331100-TD Mains 4 in & Less	623,140.65	262,280.07	-60.00%	(373,884.39)	734,744.97	59.77	12,292.55	1.97%
331200-TD Mains 6 to 8 in	16,864,910.69	6,999,229.29	-60.00%	(10,118,946.41)	19,984,627.81	60.05	332,776.07	1.97%
331300-TD Mains 10 to 16 in	15,366,248.64	6,476,078.66	-60.00%	(9,219,749.18)	18,109,919.17	59.75	303,119.19	1.97%
332000-Fire Mains	112,987.60	26,044.90	-60.00%	(67,792.56)	154,735.26	68.92	2,245.09	1.99%
333000-Services	24,394,108.21	8,645,637.88	-75.00%	(18,295,581.16)	34,044,051.49	48.32	704,552.46	2.89%
334100-Meters	6,148,332.37	2,703,871.89	-20.00%	(1,229,666.47)	4,674,126.96	12.92	361,837.46	5.89%
334200-Meter Installations	730,223.19	120,083.46	-10.00%	(73,022.32)	683,162.05	25.69	26,593.48	3.64%
335000-Hydrants	4,149,037.67	2,187,414.77	-55.00%	(2,281,970.72)	4,243,593.62	39.04	108,705.32	2.62%
341100-Trans Equip Lt Duty Trks	57,271.15	19,354.04	10.00%	5,727.12	32,189.99	3.54	9,105.97	15.90%
341200-Trans Equip Hvy Duty Trks	93,550.33	11,880.21	10.00%	9,355.03	72,315.08	8.19	8,824.56	9.43%
345000-Power Operated Equipment	376,378.66	138,095.91	15.00%	56,456.80	181,825.95	5.28	34,460.29	9.16%
	106,470,658.07	40,289,640.42		(49,485,710.20)	115,666,727.86		2,636,019.20	

**CALIFORNIA AMERICAN WATER
MONTEREY WASTEWATER
COMPUTATION OF ANNUAL DEPRECIATION ACCRUAL RATE
AT DECEMBER 31,2020**

Description	Plant In Service 12/31/2020	Allocated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual Amount	Annual Accrual Rate
354400-WW Struct & Imp Treatment	1,948,343.38	1,192,130.31	-10.00%	(194,834.34)	951,047.41	28.52	33,347.62	1.71%
355400-WW Pwr Gen Equip Treatme	8,128.04	3,197.79	-10.00%	(812.80)	5,743.05	32.62	176.07	2.17%
360000-WW Collection Sewers Force	33,232.89	11,200.47	-10.00%	(3,323.29)	25,355.71	50.51	501.95	1.51%
361100-WW Collecting Mains	3,948,258.46	1,886,257.97	0.00%	0.00	2,062,000.49	45.21	45,610.26	1.16%
363000-WW Services Sewer	23,223.96	6,805.71	0.00%	0.00	16,418.25	50.93	322.39	1.39%
370000-WW Receiving Wells	19,454.86	3,933.23	-5.00%	(972.74)	16,494.37	49.02	336.52	1.73%
371100-WW Pump Equip Elect	1,666,697.91	518,183.60	-5.00%	(83,334.90)	1,231,849.20	21.55	57,152.96	3.43%
371200-WW Pump Equip Oth Pwr	21,151.35	9,335.21	0.00%	0.00	11,816.14	11.61	1,018.04	4.81%
380000-WW TD Equipment	1,854,415.94	727,060.18	0.00%	0.00	1,127,355.76	30.91	36,473.12	1.97%
380100-WW TD Equip Sed Tanks/Acr	2,479,327.92	1,650,617.60	-5.00%	(123,966.40)	952,676.71	25.30	37,657.40	1.52%
380200-WW TD Equip Sldge/Effl Rmv	44,331.48	18,159.59	-5.00%	(2,216.57)	28,388.47	30.95	917.11	2.07%
380300-WW TD Equip Sldge Dry/Filt	306,821.94	188,968.04	-5.00%	(15,341.10)	133,195.00	26.40	5,045.33	1.64%
380450-WW TD Equip Oth Sew Rem	845,021.32	505,594.00	-5.00%	(42,251.07)	381,678.39	26.79	14,248.34	1.69%
380600-WW TD Equip Oth Disp	9,449.26	2,919.84	-5.00%	(472.46)	7,001.88	32.84	213.24	2.26%
380625-WW TD Equip Gen Trmt	3,918,395.21	2,292,595.00	-5.00%	(195,919.76)	1,821,719.97	26.43	68,916.20	1.76%
381000-WW Plant Sewers	90,541.65	56,865.98	-5.00%	(4,527.08)	38,202.75	26.13	1,461.98	1.61%
382000-WW Outfall Sewer Lines	21,712.86	10,126.32	-5.00%	(1,085.64)	12,672.18	29.70	426.65	1.96%
391200-WW Trans Equip Hvy Dty Trk	408,966.71	93,265.25	0.00%	0.00	315,701.46	9.65	32,705.32	8.00%
395000-WW Power Operated Equip	20,000.00	7,387.30	15.00%	3,000.00	9,612.70	7.67	1,252.84	6.26%
	<u>17,667,475.14</u>	<u>9,184,603.40</u>		<u>(666,058.15)</u>	<u>9,148,929.89</u>		<u>337,783.35</u>	

**CALIFORNIA AMERICAN WATER
CORONADO WATER DISTRICT
COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020**

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339300-Other P/E-Treatment	1,044	619	914	294	6.00	49	0
339500-Other P/E-TD	6,532	2,583	3,810	1,227	6.00	205	0
340100-Office Furniture & Equip	63,538	23,411	30,038	6,627	6.00	1,104	9,461
340200-Comp & Periph Equip	241,681	72,350	106,721	34,371	6.00	5,728	0
343000-Tools,Shop,Garage Equip	334,628	167,597	207,016	39,419	6.00	6,570	84,621
346100-Comm Equip Non-Telephone	59,400	21,182	31,245	10,063	6.00	1,677	0
346190-Remote Control & Instrument	261,028	75,610	82,043	6,434	6.00	1,072	62,067
347000-Misc Equipment	197,828	31,969	47,157	15,187	6.00	2,531	0
Total	1,165,678	395,322				18,937	156,149

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339300-Other P/E-Treatment	1,044	619	20	0	5.00%	52	49
339500-Other P/E-TD	6,532	2,583	30	0	3.33%	218	205
340100-Office Furniture & Equip	54,077	13,950	21	0	4.76%	2,575	1,104
340200-Comp & Periph Equip	241,681	72,350	8	0	12.50%	30,210	5,728
343000-Tools,Shop,Garage Equip	250,007	82,976	20	0	5.00%	12,500	6,570
346100-Comm Equip Non-Telephone	59,400	21,182	10	0	10.00%	5,940	1,677
346190-Remote Control & Instrument	198,961	13,543	10	0	10.00%	19,896	1,072
347000-Misc Equipment	197,828	31,969	17	0	5.88%	11,637	2,531
Total	1,009,529	239,173				83,029	18,937

**CALIFORNIA AMERICAN WATER
CORPORATE
COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31, 2020**

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339600-Other P/E-CPS	564,753	564,753	564,753	0	6.00	0	564,753
340100-Office Furniture & Equip	394,578	42,378	54,105	11,726	6.00	1,954	0
340200-Comp & Periph Equip	1,599,508	718,225	916,964	198,739	6.00	33,123	0
340300-Computer Software	9,754,423	1,174,438	1,499,415	324,977	6.00	54,163	0
340310- Main Frame Computer Software	21,674,555	8,001,677	10,215,808	2,214,131	6.00	369,022	0
343000-Tools,Shop,Garage Equip	4,813	94	120	26	6.00	4	0
346200-Comm Equip Telephone	33,319	22,183	28,322	6,138	6.00	1,023	0
347000-Misc Equipment	12,353	3,699	4,723	1,024	6.00	171	0
Total	34,038,302	10,527,449	13,284,210	2,756,761		459,460	564,753

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339600-Other P/E-CPS	0	0	7	0	14.29%	0	0
340100-Office Furniture & Equip	394,578	42,378	21	0	4.76%	18,789	1,954
340200-Comp & Periph Equip	1,599,508	718,225	8	0	12.50%	199,938	33,123
340300-Computer Software	9,754,423	1,174,438	12	0	8.33%	812,869	54,163
340310- Main Frame Computer Software	21,674,555	8,001,677	15	0	6.67%	1,444,970	369,022
343000-Tools,Shop,Garage Equip	4,813	94	20	0	5.00%	241	4
346200-Comm Equip Telephone	33,319	22,183	10	0	10.00%	3,332	1,023
347000-Misc Equipment	12,353	3,699	17	0	5.88%	727	171
Total	33,473,549	9,962,696				2,480,866	459,460

**CALIFORNIA AMERICAN WATER
LARKFIELD WATER DISTRICT
COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020**

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339100-Other P/E-Intangible	109,369	109,369	109,369	0	6.00	0	109,369
340100-Office Furniture & Equip	40,890	6,256	29,936	23,680	6.00	3,947	934
340200-Comp & Periph Equip	11,497	7,857	10,529	2,672	6.00	445	7,256
343000-Tools,Shop,Garage Equip	61,160	26,294	46,479	20,185	6.00	3,364	21,758
346100-Comm Equip Non-Telephone	22,052	5,469	14,264	8,796	6.00	1,466	3,492
346190-Remote Control & Instrument	276,725	151,012	210,480	59,468	6.00	9,911	137,648
347000-Misc Equipment	40,370	1,610	8,775	7,165	6.00	1,194	0
348000-Other Tangible Property	23,970	3,875	21,116	17,242	6.00	2,874	0
Total	586,031	311,741	450,949	139,207		23,201	280,457

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339100-Other P/E-Intangible	0	0	10	0	10.00%	0	0
340100-Office Furniture & Equip	39,956	5,322	21	0	4.76%	1,903	3,947
340200-Comp & Periph Equip	4,240	601	8	0	12.50%	530	445
343000-Tools,Shop,Garage Equip	39,402	4,536	20	0	5.00%	1,970	3,364
346100-Comm Equip Non-Telephone	18,560	1,977	10	0	10.00%	1,856	1,466
346190-Remote Control & Instrument	139,076	13,364	10	0	10.00%	13,908	9,911
347000-Misc Equipment	40,370	1,610	17	0	5.88%	2,375	1,194
348000-Other Tangible Property	23,970	3,875	21	0	4.76%	1,141	2,874
Total	305,574	31,284				23,683	23,201

**CALIFORNIA AMERICAN WATER
LOS ANGELES WATER DISTRICT
COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020**

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339500-Other P/E-TD	169,826	36,580	99,773	63,193	6.00	10,532	0
340100-Office Furniture & Equip	224,142	69,171	127,771	58,600	6.00	9,767	35,250
340200-Comp & Periph Equip	173,376	55,066	95,043	39,977	6.00	6,663	31,924
340500-Other Office Equipment	13,985	6,608	12,215	5,606	6.00	934	3,363
342000-Stores Equipment	2,502	872	2,377	1,506	6.00	251	0
343000-Tools,Shop,Garage Equip	209,807	77,454	119,773	42,319	6.00	7,053	52,956
344000-Laboratory Equipment	4,802	132	360	228	6.00	38	0
346100-Comm Equip Non-Telephone	1,202,577	1,041,702	1,052,985	11,283	6.00	1,881	1,035,170
346190-Remote Control & Instrument	422,155	331,699	348,081	16,382	6.00	2,730	322,216
347000-Misc Equipment	73,085	11,694	31,896	20,202	6.00	3,367	0
Total	2,496,257	1,630,979	1,890,274	259,296		43,216	1,480,880

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339500-Other P/E-TD	169,826	36,580	30	0	3.33%	5,661	10,532
340100-Office Furniture & Equip	188,892	33,922	21	0	4.76%	8,995	9,767
340200-Comp & Periph Equip	141,452	23,142	8	0	12.50%	17,681	6,663
340500-Other Office Equipment	10,622	3,245	15	0	6.67%	708	934
342000-Stores Equipment	2,502	872	30	0	3.33%	83	251
343000-Tools,Shop,Garage Equip	156,851	24,497	20	0	5.00%	7,843	7,053
344000-Laboratory Equipment	4,802	132	20	0	5.00%	240	38
346100-Comm Equip Non-Telephone	167,407	6,532	10	0	10.00%	16,741	1,881
346190-Remote Control & Instrument	99,938	9,483	10	0	10.00%	9,994	2,730
347000-Misc Equipment	73,085	11,694	17	0	5.88%	4,299	3,367
	1,015,377	150,099				72,245	43,216

**CALIFORNIA AMERICAN WATER
MONTEREY WATER DISTRICT
COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020**

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339200-Other P/E-Supply	124,290	49,876	96,274	46,398	6.00	7,733	0
339500-Other P/E-TD	1,964,332	241,691	466,529	224,837	6.00	37,473	0
339600-Other P/E-CPS	55,226	6,298	12,157	5,859	6.00	976	0
340100-Office Furniture & Equip	336,799	87,218	168,046	80,828	6.00	13,471	330
340200-Comp & Periph Equip	968,364	328,004	542,555	214,551	6.00	35,759	97,370
340310- Main Frame Computer Software	7,107	1,212	2,339	1,127	6.00	188	0
340500-Other Office Equipment	2,019	1,011	1,952	941	6.00	157	0
343000-Tools,Shop,Garage Equip	495,707	147,883	239,633	91,750	6.00	15,292	49,255
344000-Laboratory Equipment	178,127	50,466	97,413	46,947	6.00	7,824	0
346100-Comm Equip Non-Telephone	4,774,682	4,476,573	4,518,393	41,820	6.00	6,970	4,431,618
346190-Remote Control & Instrument	2,391,529	828,218	1,144,795	316,577	6.00	52,763	487,910
346200-Comm Equip Telephone	28,824	4,597	8,873	4,276	6.00	713	0
347000-Misc Equipment	155,961	18,507	35,723	17,216	6.00	2,869	0
	11,482,966	6,241,553	7,334,681	1,093,128		182,188	5,066,482

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339200-Other P/E-Supply	124,290	49,876	20	0	5.00%	6,214	7,733
339500-Other P/E-TD	1,964,332	241,691	30	0	3.33%	65,478	37,473
339600-Other P/E-CPS	55,226	6,298	7	0	14.29%	7,889	976
340100-Office Furniture & Equip	336,469	86,887	15	0	6.67%	22,431	13,471
340200-Comp & Periph Equip	870,994	230,634	21	0	4.76%	41,476	35,759
340310- Main Frame Computer Software	7,107	1,212	8	0	12.50%	888	188
340500-Other Office Equipment	2,019	1,011	15	0	6.67%	135	157
343000-Tools,Shop,Garage Equip	446,453	98,628	20	0	5.00%	22,323	15,292
344000-Laboratory Equipment	178,127	50,466	20	0	5.00%	8,906	7,824
346100-Comm Equip Non-Telephone	343,065	44,955	10	0	10.00%	34,306	6,970
346190-Remote Control & Instrument	1,903,619	340,308	10	0	10.00%	190,362	52,763
346200-Comm Equip Telephone	28,824	4,597	10	0	10.00%	2,882	713
347000-Misc Equipment	155,961	18,507	17	0	5.88%	9,174	2,869
	6,416,484	1,175,071				412,466	182,188

CALIFORNIA AMERICAN WATER
SACRAMENTO WATER DISTRICT

COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339600-Other P/E-CPS	1,139	1,139	1,139	0	6.00	0	1,139
340100-Office Furniture & Equip	638,325	236,404	339,500	103,095	6.00	17,183	1,562
340200-Comp & Periph Equip	1,390,993	496,826	665,955	169,129	6.00	28,188	111,565
340300-Computer Software	55,523	14,179	20,403	6,224	6.00	1,037	0.00
340500-Other Office Equipment	5,171	1,767	2,543	776	6.00	129	0
343000-Tools,Shop,Garage Equip	579,264	287,357	350,193	62,837	6.00	10,473	144,221
344000-Laboratory Equipment	255,682	28,567	41,107	12,541	6.00	2,090	0
346100-Comm Equip Non-Telephone	4,328,736	1,426,948	1,511,342	84,393	6.00	14,066	1,432,903
346190-Remote Control & Instrument	3,032,006	1,485,478	1,913,636	428,157	6.00	71,360	510,175
346200-Comm Equip Telephone	1,899,615	1,777,333	1,801,542	24,209	6.00	4,035	1,722,188
347000-Misc Equipment	2,488,278	596,030	840,329	244,299	6.00	40,716	39,541
348000-Other Tangible Property	231,845	48,615	69,957	21,342	6.00	3,557	
	14,906,577	6,400,643	7,557,646	1,157,002		192,834	3,963,294

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339600-Other P/E-CPS	0	0	7	0	14.29%	0	0
340100-Office Furniture & Equip	636,763	234,842	21	0	4.76%	30,322	17,183
340200-Comp & Periph Equip	1,279,428	385,261	8	0	12.50%	159,928	28,188
340300-Computer Software	55,523	14,179	12	0	8.33%	4,627	1,037
340500-Other Office Equipment	5,171	1,767	15	0	6.67%	345	129
343000-Tools,Shop,Garage Equip	435,043	143,136	20	0	5.00%	21,752	10,473
344000-Laboratory Equipment	255,682	28,567	20	0	5.00%	12,784	2,090
346100-Comm Equip Non-Telephone	2,895,833	(5,955)	10	0	10.00%	289,583	14,066
346190-Remote Control & Instrument	2,521,831	975,303	10	0	10.00%	252,183	71,360
346200-Comm Equip Telephone	177,427	55,145	10	0	10.00%	17,743	4,035
347000-Misc Equipment	2,448,738	556,490	17	0	5.88%	144,043	40,716
348000-Other Tangible Property	231,845	48,615	21	0	4.76%	11,040	3,557
	10,943,283	2,437,349				944,351	192,834

**CALIFORNIA AMERICAN WATER
VENTURA COUNTY WATER DISTRICT
COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020**

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
339100-Other P/E-Intangible	2,487	2,487	2,487	0	6.00	0	2,487
340100-Office Furniture & Equip	53,275	12,074	21,321	9,247	6.00	1,541	620
340200-Comp & Periph Equip	76,745	22,215	34,844	12,629	6.00	2,105	6,572
340300-Computer Software	50,834	3,516	6,354	2,838	6.00	473	0
342000-Stores Equipment	5,601	860	1,554	694	6.00	116	0
343000-Tools,Shop,Garage Equip	242,498	86,325	125,583	39,258	6.00	6,543	0
346100-Comm Equip Non-Telephone	50,388	9,992	11,777	1,785	6.00	297	7,781
346190-Remote Control & Instrument	1,372,371	804,938	880,399	75,461	6.00	12,577	711,470
347000-Misc Equipment	212,654	27,639	49,953	22,314	6.00	3,719	0
348000-Other Tangible Property	24,536	4,202	7,594	3,392	6.00	565	0
	2,091,389	974,247	1,141,868	167,620		27,937	728,930

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
339100-Other P/E-Intangible	0	0	10	0	10.00%	0	0
340100-Office Furniture & Equip	52,655	11,454	21	0	4.76%	2,507	1,541
340200-Comp & Periph Equip	70,173	15,643	8	0	12.50%	8,772	2,105
340300-Computer Software	50,834	3,516	12	0	8.33%	4,236	473
342000-Stores Equipment	5,601	860	30	0	3.33%	187	116
343000-Tools,Shop,Garage Equip	242,498	86,325	20	0	5.00%	12,125	6,543
346100-Comm Equip Non-Telephone	42,607	2,211	10	0	10.00%	4,261	297
346190-Remote Control & Instrument	660,901	93,468	10	0	10.00%	66,090	12,577
347000-Misc Equipment	212,654	27,639	17	0	5.88%	12,509	3,719
348000-Other Tangible Property	24,536	4,202	21	0	4.76%	1,168	565
	1,362,459	245,318				111,855	27,937

CALIFORNIA AMERICAN WATER
MONTEREY WASTEWATER

COMPUTATION OF ANNUAL AMORTIZATION RATE
AT DECEMBER 31,2020

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Theoretical Reserve at 12/31/20	Reserve Difference	Remaining Life	Amortize Reserve Difference	Assets To Retire
389100-WW Oth Plt & Misc Eqp Intang	52,636	52,636	52,636	0	6.00	0	52,636
389600-WW Other P/E - CPS	78,953	65,764	73,279	7,515	6.00	1,252	52,476
390000-WW Office Furniture & Equip	15,370	7,246	11,345	4,098	6.00	683	0
393000-WW Tool Shop & Garage Equip	36,972	9,186	14,381	5,195	6.00	866	0
394000-WW Laboratory Equipment	50,468	23,898	37,413	13,515	6.00	2,253	0
396000-WW Communication Equip	62,531	14,651	19,174	4,523	6.00	754	0
397000-WW Misc Equipment	56,302	25,091	39,281	14,190	6.00	2,365	0
	353,232	198,473	247,509	49,036		8,173	105,112

Excluding Fully Accrued Assets:

Description	Plant Balance at 12/31/20	Allocated Reserve at 12/31/20	Amortization Life	Amortization Net Salv %	Annual Amortization Rate	Amortization Amount	Reserve Difference Accrual
389100-WW Oth Plt & Misc Eqp Intang	0	0	10	0	10.00%	0	0
389600-WW Other P/E - CPS	26,476	13,288	7	0	14.29%	3,782	1,252
390000-WW Office Furniture & Equip	15,370	7,246	21	0	4.76%	732	683
393000-WW Tool Shop & Garage Equip	36,972	9,186	20	0	5.00%	1,849	866
394000-WW Laboratory Equipment	50,468	23,898	20	0	5.00%	2,523	2,253
396000-WW Communication Equip	62,531	14,651	10	0	10.00%	6,253	754
397000-WW Misc Equipment	56,302	25,091	17	0	5.88%	3,312	2,365
	248,119	93,360				18,451	8,173

APPENDIX B
Computation of Annual Depreciation Accrual Rate

**CALIFORNIA AMERICAN WATER
CORONADO WATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31, 2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304500-Struct & Imp-General	137,639	2.65%	3,647	2.57%	3,535	(112)
304600-Struct & Imp-Offices	989,669	4.03%	39,884	5.54%	54,802	14,918
304700-Struct & Imp-Store,Shop,Gar	107,996	4.45%	4,806	3.87%	4,181	(625)
311200-Pump Equip Electric	131,287	0.49%	637	0.97%	1,269	632
320100-WT Equip Non-Media	16,324	0.00%	0	0.35%	57	57
330000-Dist Reservoirs & Standpipes	1,164,647	2.36%	27,529	1.77%	20,667	(6,862)
331100-TD Mains 4in & Less	695,823	1.72%	11,968	2.09%	14,532	2,564
331200-TD Mains 6in to 8in	10,503,301	1.62%	169,857	2.10%	220,431	50,574
331300-TD Mains 10in to 16in	7,524,557	1.74%	130,927	2.13%	160,223	29,295
331400-TD Mains 18in & Grtr	4,759,401	1.75%	83,290	2.03%	96,378	13,089
333000-Services	12,528,806	2.52%	315,726	3.03%	379,916	64,190
334100-Meters	4,266,509	4.97%	212,045	6.46%	275,570	63,524
334200-Meter Installations	196	-1.50%	(3)	3.92%	8	11
334300- Meter Vaults	205,315	2.66%	5,461	3.75%	7,701	2,240
335000-Hydrants	1,718,774	2.17%	37,297	2.92%	50,235	12,938
339500-Other P/E-TD	1,044	0.00%	0	5.00%	52	52
339600-Other P/E-CPS	6,532	7.82%	511	3.33%	218	(293)
340100-Office Furniture & Equip	54,077	3.87%	2,093	4.76%	2,575	482
340200-Comp & Periph Equip	241,681	14.26%	34,464	12.50%	30,210	(4,254)
341100-Trans Equip Lt Duty Trks	67,314	0.00%	0	23.54%	15,843	15,843
341200-Trans Equip Hvy Duty Trks	88,360	0.55%	483	11.01%	9,726	9,243
341400-Trans Equip Other	104,977	7.94%	8,335	9.29%	9,750	1,415
343000-Tools,Shop,Garage Equip	250,007	2.90%	7,250	5.00%	12,500	5,250
345000-Power Operated Equipment	123,003	0.56%	689	6.64%	8,164	7,475
346100-Comm Equip Non-Telephone	59,400	9.95%	5,910	10.00%	5,940	30
346190-Remote Control & Instrument	198,961	4.60%	9,152	10.00%	19,896	10,744
347000-Misc Equipment	197,828	7.25%	14,343	5.88%	11,637	(2,706)
	46,143,427	2.44%	1,126,302	3.07%	1,416,017	289,715
AR 15 True-up Amortization	156,149				18,937	18,937
Total	46,299,576		1,126,302		1,434,954	308,652
Coronado						
Water Operations	45,133,898		1,052,579		1,332,989	280,409
General Plant AR 15 implementation	1,165,678		73,723		101,965	28,243
Total	46,299,576		1,126,302		1,434,954	308,652

**CALIFORNIA AMERICAN WATER
CORPORATE DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31, 2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304500-Struct & Imp-General	301,157	2.14%	6,445	2.57%	7,729	1,284
339600-Other P/E-CPS	0	-1.10%	0	14.29%	0	0
340100-Office Furniture & Equip	394,578	4.32%	17,046	4.76%	18,789	1,744
340200-Comp & Periph Equip	1,599,508	7.79%	124,602	12.50%	199,938	75,337
340300-Computer Software	9,754,423	14.36%	1,400,735	8.33%	812,869	(587,867)
340310- Main Frame Computer Software	21,674,555	5.49%	1,189,933	6.67%	1,444,970	255,037
343000-Tools,Shop,Garage Equip	4,813	0.83%	40	5.00%	241	201
346200-Comm Equip Telephone	33,319	5.18%	1,726	10.00%	3,332	1,606
347000-Misc Equipment	12,353	0.00%	0	5.88%	727	727
Subtotal	33,774,707	8.11%	2,740,526	7.37%	2,488,595	(251,931)
AR 15 True-up Amortization	564,753				459,460	459,460
Total Corporate	34,339,460		2,740,526		2,948,055	207,529
Corporate						
Water Operations	301,157		6,445		7,729	1,284
General Plant AR 15 implementation	34,038,302		2,734,082		2,940,326	206,245
Total	34,339,460		2,740,526		2,948,055	207,529

**CALIFORNIA AMERICAN WATER
LARKFIELD WATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31, 2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304100-Struct & Imp-Supply	205,637	2.57%	5,285	2.19%	4,508	(777)
304200-Struct & Imp-Pumping	224,544	0.37%	831	2.98%	6,698	5,868
304300-Struct & Imp-Treatment	442,703	1.62%	7,193	1.96%	8,669	1,477
304400-Struct & Imp-T&D	447,178	2.66%	11,916	2.83%	12,673	757
304500-Struct & Imp-General	67,294	4.20%	2,826	2.84%	1,910	(917)
307000-Wells & Springs	1,964,484	3.34%	65,614	1.88%	36,949	(28,665)
309000-Supply Mains	172,839	1.89%	3,267	1.30%	2,254	(1,013)
310000-Power Generation Equipment	5,367	24.27%	1,303	4.80%	258	(1,045)
311200-Pump Equip Electric	944,365	4.25%	40,136	2.59%	24,466	(15,669)
311400-Pump Equip Hydraulic	1,842	11.76%	216	3.39%	62	(154)
320100-WT Equip Non-Media	1,610,838	2.61%	42,043	2.81%	45,246	3,203
320200-WT Equip Filter Media	135,666	19.43%	26,364	9.60%	13,030	(13,334)
330000-Dist Reservoirs & Standpipes	1,472,218	1.56%	22,967	1.62%	23,898	931
330100-Ground Level Facilities	7,896	5.78%	456	1.62%	128	(329)
330200-Below Grade Facilities	207,004	2.74%	5,672	1.65%	3,406	(2,265)
331001-TD Mains Not Classified	179,791	-9.24%	(16,619)	1.92%	3,453	20,072
331100-TD Mains 4in & Less	237,248	2.17%	5,148	1.93%	4,576	(573)
331200-TD Mains 6in to 8in	2,980,299	2.09%	62,288	1.86%	55,541	(6,747)
331300-TD Mains 10in to 16in	1,595,534	2.10%	33,506	1.92%	30,630	(2,876)
332000-Fire Mains	17,961	1.80%	323	1.98%	356	32
333000-Services	2,113,070	3.11%	65,716	2.79%	59,057	(6,659)
334100-Meters	866,650	5.52%	47,839	5.63%	48,789	950
335000-Hydrants	612,421	2.64%	16,168	2.52%	15,421	(747)
339100-Other P/E-Intangible	0	3.76%	0	10.00%	0	0
340100-Office Furniture & Equip	39,956	2.98%	1,191	4.76%	1,903	712
340200-Comp & Periph Equip	4,240	15.64%	663	12.50%	530	(133)
341200-Trans Equip Hvy Duty Trks	477	0.00%	0	0.00%	0	0
343000-Tools,Shop,Garage Equip	39,402	2.93%	1,154	5.00%	1,970	816
345000-Power Operated Equipment	57,827	3.45%	1,995	4.63%	2,678	683
346100-Comm Equip Non-Telephone	18,560	2.66%	494	10.00%	1,856	1,362
346190-Remote Control & Instrument	139,076	5.76%	8,011	10.00%	13,908	5,897
347000-Misc Equipment	40,370	7.99%	3,226	5.88%	2,375	(851)
348000-Other Tangible Property	23,970	2.57%	616	4.76%	1,141	525
	<u>16,876,727</u>	<u>2.77%</u>	<u>467,807</u>	<u>2.54%</u>	<u>428,340</u>	<u>(39,467)</u>
AR 15 True-up Amortization	280,457				23,201	23,201
Total	<u>17,157,184</u>		<u>467,807</u>		<u>451,541</u>	<u>(16,266)</u>
Larkfield						
Water Operations	16,571,153		452,453		404,657	(48,479)
General Plant AR 15 implementation	586,031		15,354		46,884	32,213
Total	<u>17,157,184</u>		<u>467,807</u>		<u>451,541</u>	<u>(16,266)</u>

**CALIFORNIA AMERICAN WATER
LOS ANGELES WATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31,2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304100-Struct & Imp-Supply	1,055,710	4.07%	42,967	2.49%	26,253	(16,715)
304200-Struct & Imp-Pumping	1,849,559	3.64%	67,375	3.15%	58,241	(9,134)
304300-Struct & Imp-Treatment	395,438	2.00%	7,925	1.90%	7,527	(398)
304400-Struct & Imp-T&D	101,365	4.38%	4,440	4.50%	4,562	122
304500-Struct & Imp-General	468,144	2.48%	11,610	3.47%	16,227	4,617
304600-Struct & Imp Offices	354,252	4.83%	17,110	8.47%	30,009	12,899
304700-Struct & Imp-Store,Shop,Gar	277,052	2.74%	7,591	10.73%	29,722	22,131
305000-Collect & Impound Reservoirs	55,920	1.33%	744	1.48%	830	87
306000-Lake, River & Other Intakes	350,313	2.51%	8,793	2.49%	8,707	(86)
307000-Wells & Springs	15,727,891	3.33%	523,739	2.59%	408,099	(115,640)
309000-Supply Mains	292,088	1.70%	4,965	1.52%	4,440	(526)
310000-Power Generation Equipment	5,940	0.00%	0	5.33%	317	317
311200-Pump Equip Electric	13,655,859	3.48%	475,497	3.95%	539,260	63,763
311540-Pump Equip TD	3,524	0.00%	0	3.94%	139	139
320100-WT Equip Non-Media	2,336,664	2.51%	58,736	2.72%	63,669	4,933
320190-WT Equip-Basin,Clearwell	158	-0.96%	(2)	1.28%	2	4
320193-WT Equip-Chemical Feed	108	0.47%	1	1.28%	1	1
330000-Dist Reservoirs & Standpipes	10,101,867	1.40%	141,426	1.71%	172,742	31,316
331001-TD Mains Not Classified	3,411,676	2.02%	68,916	2.02%	68,908	(8)
331100-TD Mains 4in & Less	3,255,863	1.88%	61,210	2.03%	66,237	5,026
331200-TD Mains 6in to 8in	27,033,567	1.77%	478,494	2.05%	554,766	76,272
331300-TD Mains 10in to 16in	21,365,403	1.73%	370,479	2.05%	438,597	68,118
331400-TD Mains 18in & Grtr	1,542,945	2.00%	30,859	2.01%	31,038	179
333000-Services	32,398,804	2.86%	926,606	2.97%	963,614	37,008
334100-Meters	9,106,804	4.82%	438,948	6.28%	571,918	132,970
334102-Meters Greater than 1"	57,028	3.89%	2,216	6.02%	3,432	1,216
334200-Meter Installations	456,575	4.33%	19,770	3.82%	17,434	(2,336)
334300- Meter Vaults	8,643	2.46%	213	3.79%	327	115
335000-Hydrants	5,661,569	2.29%	129,650	2.74%	155,399	25,749
339500-Other P/E-TD	169,826	0.77%	1,310	3.33%	5,661	4,351
340100-Office Furniture & Equip	188,892	4.49%	8,481	4.76%	8,995	514
340200-Comp & Periph Equip	141,452	14.15%	20,015	12.50%	17,681	(2,334)
340500-Other Office Equipment	10,622	5.29%	562	6.67%	708	146
341100-Trans Equip Lt Duty Trks	26,483	0.00%	0	8.41%	2,228	2,228
341200-Trans Equip Hvy Duty Trks	69,100	0.00%	0	12.74%	8,801	8,801
341300-Trans Equip Autos	71,347	0.00%	0	17.69%	12,623	12,623
342000-Stores Equipment	2,502	0.52%	13	3.33%	83	70
343000-Tools,Shop,Garage Equip	156,851	3.13%	4,909	5.00%	7,843	2,933
344000-Laboratory Equipment	4,802	5.05%	242	5.00%	240	(2)
345000-Power Operated Equipment	33,345	1.43%	477	5.45%	1,818	1,341
346100-Comm Equip Non-Telephone	167,407	2.19%	3,666	10.00%	16,741	13,074
346190-Remote Control & Instrument	99,938	6.00%	5,996	10.00%	9,994	3,998
347000-Misc Equipment	73,085	4.75%	3,472	5.88%	4,299	828
Total	152,546,382	2.59%	3,949,423	2.85%	4,340,129	390,707
AR 15 True-up Amortization	1,480,880				43,216	43,216
Total	154,027,262		3,949,423		4,383,345	433,922
Los Angeles						
Water Operations	151,531,004		3,900,756		4,267,884	367,129
General Plant AR 15 implementation	2,496,257		48,667		115,461	66,794
Total	154,027,262		3,949,423		4,383,345	433,922

**CALIFORNIA AMERICAN WATER
MONTEREY WATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31,2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304100-Struct & Imp-Supply	4,755,119	2.71%	128,864	2.33%	110,936	(17,928)
304200-Struct & Imp-Pumping	6,303,388	1.72%	108,418	3.28%	206,895	98,477
304300-Struct & Imp-Treatment	10,095,455	1.80%	181,718	1.68%	169,259	(12,460)
304400-Struct & Imp-T&D	944,359	4.19%	39,569	4.32%	40,795	1,227
304500-Struct & Imp-General	1,783,732	2.03%	36,210	2.81%	50,085	13,875
304600-Struct & Imp-Offices	229,864	3.56%	8,183	5.51%	12,662	4,479
304700-Struct & Imp-Store,Shop,Gar	166,314	3.24%	5,381	4.65%	7,727	2,347
304800-Struct & Imp-Misc	115,948	6.95%	8,058	6.45%	7,474	(584)
305000-Collect & Impound Reservoirs	1,815,478	7.35%	133,438	0.57%	10,419	(123,019)
306000-Lake, River & Other Intakes	57,852	2.45%	1,417	2.31%	1,336	(81)
307000-Wells & Springs	14,618,454	5.23%	764,545	2.28%	333,888	(430,657)
309000-Supply Mains	4,968,688	2.47%	122,727	1.36%	67,625	(55,101)
310000-Power Generation Equip	1,889,700	3.89%	73,509	5.57%	105,165	31,655
311200-Pump Eqp Electric	22,000,036	4.09%	899,801	4.19%	922,016	22,214
311300-Pump Eqp Diesel	62,926	3.44%	2,167	4.28%	2,695	527
311400-Pump Eqp Hydraulic	195,421	4.05%	7,915	4.12%	8,061	147
311500-Pump Eqp Other	411,864	4.43%	18,246	4.10%	16,887	(1,358)
320100-WT Equip Non-Media	20,818,681	2.19%	456,855	2.37%	492,833	35,979
320200-WT Equip Filter Media	539,160	7.23%	38,981	4.63%	24,988	(13,994)
330000-Dist Reservoirs & Standpipes	18,067,998	1.92%	346,906	1.64%	296,080	(50,826)
330200-Ground Level Tanks	8,629,286	2.46%	212,280	1.66%	143,312	(68,969)
331001-TD Mains Unclassified	114,008	0.00%	0	1.98%	2,255	2,255
331100-TD Mains 4 in & Less	9,392,876	2.33%	218,854	1.98%	185,941	(32,913)
331200-TD Mains 6 to 8 in	66,632,642	2.17%	1,445,928	1.97%	1,315,978	(129,951)
331300-TD Mains 10 to 16 in	33,201,629	2.30%	763,637	1.96%	650,131	(113,506)
331400-TD Mains 18 in & greater	68,822,187	2.26%	1,555,381	2.00%	1,373,095	(182,287)
333000-Services	32,558,617	2.30%	748,848	2.87%	934,417	185,569
334100-Meters	12,114,277	4.49%	543,931	5.92%	716,819	172,888
334300-Meter Vaults	734,401	2.48%	18,213	3.65%	26,842	8,629
335000-Hydrants	10,136,997	2.41%	244,302	2.63%	266,527	22,226
339200-Other P/E-Supply	124,290	2.76%	3,437	3.33%	4,143	706
339500-Other P/E-TD	1,964,332	0.00%	0	14.29%	280,619	280,619
339600-Other P/E-CPS	55,226	-6.05%	(3,341)	6.67%	3,682	7,023
340100-Office Furniture & Equip	336,469	4.88%	16,420	4.76%	16,022	(397)
340200-Comp & Periph Equip	870,994	11.10%	96,680	12.50%	108,874	12,194
340310- Main Frame Computer Software	7,107	0.00%	0	6.67%	474	474
340500-Other Office Equipment	2,019	5.06%	102	5.00%	101	(1)
341100-Trans Equip Lt Duty Trks	71,417	0.00%	0	8.37%	5,977	5,977
341200-Trans Equip Hvy Duty Trks	115,189	0.00%	0	8.37%	9,641	9,641
341400-Trans Equip Other	130,566	9.10%	11,882	12.08%	15,771	3,890
343000-Tools,Shop,Garage Equip	446,453	3.49%	15,581	5.00%	22,323	6,741
344000-Laboratory Equipment	178,127	3.20%	5,700	5.00%	8,906	3,206
345000-Power Operated Equipment	156,298	3.01%	4,705	3.84%	5,994	1,289
346100-Comm Equip Non-Telephone	343,065	3.90%	13,380	10.00%	34,306	20,927
346190-Remote Control & Instrument	1,903,619	5.44%	103,557	10.00%	190,362	86,805
346200-Comm Equip Telephone	28,824	12.97%	3,738	10.00%	2,882	(856)
347000-Misc Equipment	155,961	7.02%	10,948	5.88%	9,174	(1,774)
	359,067,308	2.62%	9,417,071	2.57%	9,222,395	(194,676)
AR 15 True-up Amortization	5,066,482				182,188	182,188
Total Monterey	364,133,790		9,417,071		9,404,583	(12,488)
Monterey						
Water Operations	352,650,824		9,150,869		8,540,527	(631,139)
General Plant AR 15 implementation	11,482,966		266,202		864,057	618,652
Total	364,133,790		9,417,071		9,404,583	(12,488)

**CALIFORNIA AMERICAN WATER
SACRAMENTO WATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31, 2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304100-Struct & Imp-Supply	7,567,792	2.73%	206,269	2.46%	186,336	(19,934)
304200-Struct & Imp-Pumping	15,028,299	1.85%	278,444	3.04%	457,547	179,102
304300-Struct & Imp-Treatment	10,321,972	2.00%	206,454	1.87%	193,386	(13,068)
304400-Struct & Imp-T&D	1,186,115	2.76%	32,730	4.28%	50,726	17,996
304500-Struct & Imp-General	7,044,913	2.30%	161,952	2.80%	197,315	35,363
304700-Struct & Imp-Store,Shop,Gar	308,573	2.55%	7,876	3.74%	11,534	3,657
306000-Lake, River & Other Intakes	12,735	3.90%	497	2.42%	309	(188)
307000-Wells & Springs	26,084,195	3.01%	785,671	2.67%	695,299	(90,372)
309000-Supply Mains	6,722,161	1.78%	119,833	1.56%	104,667	(15,167)
310000-Power Generation Equip	2,906,545	4.06%	117,869	5.53%	160,625	42,756
311200-Pump Equip Electric	37,675,011	4.05%	1,525,512	3.58%	1,347,630	(177,882)
311400-Pump Equip Hydraulic	1,219,606	4.02%	48,978	3.73%	45,450	(3,529)
311500-Pump Equip Other	1,138,298	4.13%	46,985	4.67%	53,153	6,168
320100-WT Equip Non-Media	32,030,608	2.35%	753,897	2.63%	841,647	87,750
320193-WT Equip-Chemical Feed	2,627,526	2.35%	61,843	13.12%	344,654	282,811
320200-WT Equip Filter Media	1,675,292	8.20%	137,335	5.24%	87,854	(49,481)
330000-Dist Reservoirs & Standpipes	6,145,880	1.39%	85,156	1.62%	99,627	14,470
330002-Tank Original Painting	24,606	1.79%	441	1.65%	405	(36)
330003-Tank Repainting	609,461	2.02%	12,297	1.65%	10,041	(2,256)
330003-Tank Repainting	4,246,436	3.25%	138,009	1.64%	69,469	(68,540)
330200-Ground Level Tanks	13,039,379	2.86%	373,303	1.66%	216,216	(157,087)
330300-Below Ground Tanks	133,378	2.80%	3,741	1.61%	2,152	(1,589)
331001-TD Mains Unclassified	16,524,914	1.89%	312,353	2.01%	332,763	20,411
331100-TD Mains 4 in & Less	41,357,582	1.56%	644,536	1.91%	788,801	144,264
331200-TD Mains 6 to 8 in	25,781,433	1.73%	445,111	1.98%	509,797	64,687
331300-TD Mains 10 to 16 in	27,014,181	1.75%	474,043	1.98%	534,332	60,289
331400-TD Mains 18 in & greater	6,686,782	1.73%	115,390	1.98%	132,622	17,232
332000-Fire Mains	20,425	1.73%	354	1.97%	403	49
333000-Services	33,891,218	2.41%	817,143	2.83%	959,546	142,402
334100-Meters	21,763,321	4.91%	1,068,355	5.72%	1,245,307	176,953
334200-Meter Installations	33,483,639	5.16%	1,727,739	3.54%	1,184,875	(542,864)
335000-Hydrants	11,828,694	2.14%	253,213	2.57%	303,704	50,491
339600-Other P/E-CPS	0	0.00%	0	14.29%	0	0
340100-Office Furniture & Equip	636,763	2.95%	18,785	4.76%	30,322	11,538
340200-Comp & Periph Equip	1,279,428	11.31%	144,703	12.50%	159,928	15,225
340300-Computer Software	55,523	6.29%	3,492	8.33%	4,627	1,135
340500-Other Office Equipment	5,171	0.00%	0	6.67%	345	345
341100-Trans Equip Lt Duty Trks	911,748	0.21%	1,948	14.86%	135,477	133,529
341200-Trans Equip Hvy Duty Trks	151,471	3.25%	4,923	9.45%	14,320	9,397
343000-Tools,Shop,Garage Equip	435,043	3.16%	13,755	5.00%	21,752	7,997
344000-Laboratory Equipment	255,682	5.37%	13,725	5.00%	12,784	(941)
345000-Power Operated Equipment	431,239	3.34%	14,420	5.10%	22,011	7,591
346100-Comm Equip Non-Telephone	2,895,833	2.54%	73,579	10.00%	289,583	216,004
346190-Remote Control & Instrument	2,521,831	5.55%	140,046	10.00%	252,183	112,137
346200-Comm Equip Telephone	177,427	2.72%	4,823	10.00%	17,743	12,920
347000-Misc Equipment	2,448,738	4.74%	116,009	5.88%	144,043	28,034
348000-Other Tangible Property	231,845	4.99%	11,558	4.76%	11,040	(518)
354400-WW Struct & Imp Treatment	2,877,903	2.81%	80,750	5.10%	146,891	66,141
361100-WW Collecting Mains	366,515	3.66%	13,412	2.59%	9,476	(3,936)
370000-WW Receiving Wells	98,937	13.81%	13,659	2.15%	2,131	(11,529)
380000-WW TD Equipment	18,371	2.67%	490	1.77%	326	(164)
397000-WW Misc Equipment	14,711	4.24%	624	2.94%	433	(191)
Total	411,915,144	2.82%	11,634,036	3.02%	12,443,609	809,574
AR 15 True-up Amortization	3,963,294				192,834	192,834
Total	415,878,438		11,634,036		12,636,443	1,002,407
Sacramento						
Water Operations	397,595,423		10,984,624		11,340,001	355,377
Sewer Operations	3,361,727		108,312		158,824	50,513
General Plant AR 15 implementation	14,921,287		541,100		1,137,618	596,518
	415,878,438		11,634,036		12,636,443	1,002,407

**CALIFORNIA AMERICAN WATER
VILLAGE WATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31, 2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
304100-Struct & Imp-Supply	283,322	2.72%	7,715	2.50%	7,086	(629)
304200-Struct & Imp-Pumping	1,029,987	1.83%	18,888	2.82%	29,079	10,191
304400-Struct & Imp-T&D	444,559	2.55%	11,320	4.35%	19,354	8,034
304500-Struct & Imp-General	743,271	3.22%	23,902	2.66%	19,802	(4,100)
304600-Struct & Imp-Offices	243,298	3.08%	7,498	6.11%	14,855	7,357
304620-Struct & Imp-Leasehold	14,135	3.68%	520	4.50%	636	115
304700-Struct & Imp-Store,Shop,Gar	2,070	0.00%	0	13.08%	271	271
306000-Lake, River & Other Intakes	910,276	3.10%	28,175	2.52%	22,964	(5,211)
309000-Supply Mains	424,085	1.68%	7,125	1.56%	6,632	(493)
311200-Pump Eqp Electric	5,236,399	3.94%	206,089	2.77%	145,131	(60,959)
311400-Pump Eqp Hydraulic	431	5.56%	24	3.11%	13	(11)
320100-WT Equip Non-Media	97,686	2.48%	2,418	2.58%	2,520	102
330000-Dist Reservoirs & Standpipes	27,012,303	1.61%	433,733	1.65%	444,702	10,968
330200-Ground Level Tanks	1,112,647	2.53%	28,166	1.66%	18,464	(9,702)
331100-TD Mains 4 in & Less	623,141	1.71%	10,679	1.97%	12,293	1,613
331200-TD Mains 6 to 8 in	16,864,911	1.64%	277,352	1.97%	332,776	55,424
331300-TD Mains 10 to 16 in	15,366,249	1.62%	249,362	1.97%	303,119	53,757
332000-Fire Mains	112,988	1.76%	1,993	1.99%	2,245	252
333000-Services	24,394,108	3.37%	822,240	2.89%	704,552	(117,687)
334100-Meters	6,148,332	4.80%	295,082	5.89%	361,837	66,755
334200-Meter Installations	730,223	4.90%	35,776	3.64%	26,593	(9,182)
335000-Hydrants	4,149,038	3.05%	126,385	2.62%	108,705	(17,679)
339100-Other P/E-Intangible	0	0.00%	0	10.00%	0	0
340100-Office Furniture & Equip	52,655	4.54%	2,391	4.76%	2,507	116
340200-Comp & Periph Equip	70,173	12.97%	9,099	12.50%	8,772	(327)
340300-Computer Software	50,834	12.08%	6,142	8.33%	4,236	(1,906)
341100-Trans Equip Lt Duty Trks	57,271	0.00%	0	15.90%	9,106	9,106
341200-Trans Equip Hvy Duty Trks	93,550	7.64%	7,147	9.43%	8,825	1,677
342000-Stores Equipment	5,601	3.34%	187	3.33%	187	(0)
343000-Tools,Shop,Garage Equip	242,498	3.10%	7,517	5.00%	12,125	4,607
345000-Power Operated Equipment	376,379	0.26%	979	9.16%	34,460	33,482
346100-Comm Equip Non-Telephone	42,607	4.28%	1,824	10.00%	4,261	2,437
346190-Remote Control & Instrument	660,901	5.66%	37,407	10.00%	66,090	28,683
347000-Misc Equipment	212,654	7.49%	15,928	5.88%	12,509	(3,419)
348000-Other Tangible Property	24,536	4.74%	1,163	4.76%	1,168	5
	107,833,117	2.49%	2,684,224	2.55%	2,747,874	63,650
AR 15 True-up Amortization	728,930				27,937	27,937
Total Village	108,562,047		2,684,224		2,775,811	91,587
Village						
Water Operations	106,470,658		2,602,567		2,636,019	33,453
General Plant AR 15 implementation	2,091,389		81,658		139,792	58,134
	108,562,047		2,684,224		2,775,811	91,587

**CALIFORNIA AMERICAN WATER
MONTEREY WASTEWATER DISTRICT
COMPARISON OF EXISTING VS PROPOSED DEPRECIATION RATES
AT DECEMBER 31, 2020**

Account	Plant at 12/31/2020	Existing Accrual Rates	Accrual at Existing Rates	Proposed Accrual Rates	Accrual at Proposed Rates	Change in Expense
354400-WW Struct & Imp Treatment	1,948,343	2.09%	40,689	1.71%	33,348	(7,342)
355400-WW Pwr Gen Equip Treatment	8,128	14.69%	1,194	2.17%	176	(1,018)
360000-WW Collection Sewers Forced	33,233	2.67%	888	1.51%	502	(386)
361100-WW Collecting Mains	3,948,258	1.65%	64,966	1.16%	45,610	(19,356)
363000-WW Services Sewer	23,224	2.39%	554	1.39%	322	(232)
370000-WW Receiving Wells	19,455	4.81%	937	1.73%	337	(600)
371100-WW Pump Equip Elect	1,666,698	3.22%	53,636	3.43%	57,153	3,517
371200-WW Pump Equip Oth Pwr	21,151	5.18%	1,096	4.81%	1,018	(78)
380000-WW TD Equipment	1,854,416	2.85%	52,919	1.97%	36,473	(16,446)
380100-WW TD Equip Sed Tanks/Acc	2,479,328	1.18%	29,372	1.52%	37,657	8,285
380200-WW TD Equip Sldge/Effl Rmv	44,331	2.85%	1,265	2.07%	917	(348)
380300-WW TD Equip Sldge Dry/Filt	306,822	2.31%	7,084	1.64%	5,045	(2,039)
380450-WW TD Equip Oth Sew Rem	845,021	2.49%	21,030	1.69%	14,248	(6,782)
380600-WW TD Equip Oth Disp	9,449	2.58%	244	2.26%	213	(31)
380625-WW TD Equip Gen Trmt	3,918,395	1.63%	63,756	1.76%	68,916	5,161
381000-WW Plant Sewers	90,542	1.11%	1,004	1.61%	1,462	458
382000-WW Outfall Sewer Lines	21,713	2.34%	509	1.96%	427	(82)
389100-WW Oth Plt & Misc Eqp Intang	0	0.99%	0	10.00%	0	0
389600-WW Other P/E - CPS	26,476	2.43%	642	14.29%	3,782	3,140
390000-WW Office Furniture & Equip	15,370	6.05%	930	4.76%	732	(198)
391200-WW Trans Equip Hvy Dty Trks	408,967	3.20%	13,106	8.00%	32,705	19,600
393000-WW Tool Shop & Garage Equip	36,972	3.59%	1,328	5.00%	1,849	520
394000-WW Laboratory Equipment	50,468	1.49%	754	5.00%	2,523	1,769
395000-WW Power Operated Equip	20,000	1.64%	329	6.26%	1,253	924
396000-WW Communication Equip	62,531	5.65%	3,535	10.00%	6,253	2,718
397000-WW Misc Equipment	56,302	4.93%	2,773	5.88%	3,312	539
	17,915,595	2.03%	364,541	1.99%	356,235	(8,306)
AR 15 True-up Amortization	105,112				8,173	8,173
Total Monterey WW	18,020,707		364,541		364,407	(134)
Monterey WW						
Waterwater Operations	17,667,475		354,578		337,783	(16,795)
General Plant AR 15 implementation	353,232		9,963		26,624	16,661
Total	18,020,707		364,541		364,407	(134)
Total CAW	1,158,418,464		32,383,930		34,399,140	2,015,210
Water Operations	1,070,254,119		28,150,292		28,529,806	358,034
Waterwater Operations	21,029,202		462,890		496,607	33,718
General Plant AR15 Implentation	67,135,143		3,770,748		5,372,727	1,623,459
Total CAW	1,158,418,464		32,383,930		34,399,140	2,015,210

APPENDIX C
Summary of Existing & Proposed Depreciation Parameters

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
304200	Coronado	Struct & Imp P	35	S6	-20.00%	35	L0.5	-10.00%
304500	Coronado	Struc & Imp- Genera	NA	NA	NA	42	R2.5	-5.00%
304600	Coronado	Struct & Imp Offices	28	S6	-5.00%	21	R2	-5.00%
304700	Coronado	Struct & Imp Store,Shop,Gar	28	S6	-5.00%	30	L4	-5.00%
309000	Coronado	Supply Mains	70	R1	-30.00%	80	R2	-25.00%
311200	Coronado	Pump Equip Electric	28	S6	-15.00%	28	R2	-10.00%
320100	Coronado	WT Equip Non-Media	16	S4	0.00%	37	R1	-10.00%
330000	Coronado	Dist Reservoirs & Standpipes	43	R5	-15.00%	75	R2	-25.00%
330200	Coronado	Ground Level Facilities	43	R5	-15.00%	75	R2	-25.00%
331100	Coronado	TD Mains 4in & Less	75	S3	-30.00%	80	R2	-60.00%
331200	Coronado	TD Mains 6in to 8in	75	S3	-30.00%	80	R2	-60.00%
331300	Coronado	TD Mains 10in to 16in	75	S3	-30.00%	80	R2	-60.00%
331400	Coronado	TD Mains 18in & Grtr	75	S3	-30.00%	80	R2	-60.00%
333000	Coronado	Services	56	S5	-50.00%	60	S1	-75.00%
334100	Coronado	Meters	20	SQ	0.00%	20	SQ	-20.00%
334200	Coronado	Meter Installations	20	SQ	0	30	R2	-10.00%
334300	Coronado	Meter Vaults	NA	NA	NA	30	R2	-10.00%
335000	Coronado	Hydrants	53	R4	-30.00%	58	R3	-55.00%
339300	Coronado	Other P/E WT	10	SQ	0.00%	20	SQ	0.00%
339500	Coronado	Other P/E TD	10	SQ	0.00%	30	SQ	0.00%
340100	Coronado	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%
340200	Coronado	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%
340300	Coronado	Computer Software	7	L2	0.00%	12	SQ	0.00%
340500	Coronado	Other Office Equipment	20	L0	0.00%	12	SQ	0.00%
341100	Coronado	Trans Equip Lt Duty Trks	11	R1	10.00%	11	S1.5	10.00%
341200	Coronado	Trans Equip Hvy Duty Trks	11	R1	15.00%	11	L2.5	10.00%
341300	Coronado	Trans Equip Autos	11	R1	10.00%	11	L2.5	10.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
341400	Coronado	Trans Equip Autos	11	R1	10.00%	11	L2.5	10.00%
343000	Coronado	Tools,Shop,Garage Equip	28	S6	0.00%	20	SQ	0.00%
345000	Coronado	Power Operated Equipment	23	S6	15.00%	24	R4	15.00%
346100	Coronado	Comm Equip Non- Telephone	18	R3	0.00%	10	SQ	0.00%
346190	Coronado	Remote Control & Instru				10	SQ	0.00%
347000	Coronado	Misc Equipment	13	S5	0.00%	17	SQ	0.00%
348000	Coronado	Other Tangible Property	20	R2	0.00%	21	SQ	0.00%

304500	Corporate	Struct & Imp AG	44	R5	-5.00%	42	R2.5	-5.00%
304620	Corporate	Struc & Imp Leasehold	30	R2	0.00%	30	R2	0.00%
339600	Corporate	Other P/E-CPS	NA	NA		7	SQ	0.00%
340100	Corporate	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%
340200	Corporate	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%
340300	Corporate	Computer Software	7	L2	0.00%	12	SQ	0.00%
340310	Corporate	Main Frame Computer Software	NA	NA		15	SQ	0.00%
340500	Corporate	Other Office Equipment	10	L0	0.00%	12	SQ	0.00%
341100	Corporate	Trans Equip Lt Duty Trks	11	R1	0.00%	11	R1	10.00%
343000	Corporate	Tools,Shop,Garage Equip	20	R2	0.00%	20	SQ	0.00%
346200	Corporate	Comm Equip Telephone	NA	NA		10	SQ	0.00%
347000	Corporate	Misc Equipment	13	S5	0.00%	17	SQ	0.00%
348000	Corporate	Other Tangible Property	20	R2	0.00%	21	SQ	0.00%

304100	Larkfield	Struct & Imp SS	40	R5	-5.00%	44	R2.5	-10.00%
304200	Larkfield	Struct & Imp P	65	R5	-20.00%	35	L0.5	-10.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
304300	Larkfield	Struct & Imp WT	50	R5	-5.00%	52	R2.5	-10.00%
304400	Larkfield	Struct & Imp TD	40	R5	-5.00%	25	R2.5	-10.00%
304500	Larkfield	Struct & Imp AG	25	R2	0.00%	42	R2.5	-5.00%
304600	Larkfield	Struct & Imp Offices	30	R2	0.00%	21	R2	-5.00%
304700	Larkfield	Struct & Imp Store,Shop,Gar				30	L4	-5.00%
307000	Larkfield	Wells & Springs	45	R4	-50.00%	45	R4	-20.00%
309000	Larkfield	Supply Mains	70	R2	-35.00%	80	R2	-25.00%
310000	Larkfield	Power Generation Equip	22	R1	-15.00%	22	R1	-10.00%
311200	Larkfield	Pump Equip Electric	28	S6	-15.00%	28	R2	-10.00%
311400	Larkfield	Pump Equip Hydraulic	28	S6	-15.00%	28	L1	-10.00%
320100	Larkfield	WT Equip Non-Media	42	R2	-15.00%	37	R1	-10.00%
320200	Larkfield	WT Equip Filter Media	10	S4	-5.00%	18	S0.5	-10.00%
330000	Larkfield	Dist Reservoirs & Standpipes	65	R4	-15.00%	75	R2	-25.00%
330100	Larkfield	Elevated Tanks & Standpipes	41	R4	0.00%	75	R2	-25.00%
330200	Larkfield	Ground Level Facilities	41	R4	-15.00%	75	R2	-25.00%
331001	Larkfield	TD Mains Not Classified by Siz	75	S3	-35.00%	80	R2	-60.00%
331100	Larkfield	TD Mains 4in & Less	75	S3	-35.00%	80	R2	-60.00%
331200	Larkfield	TD Mains 6in to 8in	75	S3	-35.00%	80	R2	-60.00%
331300	Larkfield	TD Mains 10in to 16in	75	S3	-35.00%	80	R2	-60.00%
332000	Larkfield	Fire Mains	75	S3	-35.00%	80	R2	-60.00%
333000	Larkfield	Services	50	S3	-50.00%	60	S1	-75.00%
334100	Larkfield	Meters	20	SQ	0.00%	20	SQ	-20.00%
335000	Larkfield	Hydrants	55	R4	-30.00%	58	R3	-55.00%
339100	Larkfield	Other P/E Intangible	22	L2	0.00%	10	SQ	0.00%
340100	Larkfield	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
340200	Larkfield	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%
340300	Larkfield	Computer Software	7	L2	0.00%	12	SQ	0.00%
341100	Larkfield	Trans Equip Lt Duty Trks	11	R1	10.00%	11	S1.5	10.00%
341200	Larkfield	Trans Equip Hvy Duty Trks	11	R1	10.00%	11	L2.5	10.00%
343000	Larkfield	Tools,Shop,Garage Equip	28	S6	0.00%	20	SQ	0.00%
344000	Larkfield	Laboratory Equipment	20	R2	0.00%	20	SQ	0.00%
345000	Larkfield	Power Operated Equipment	23	S6	15.00%	24	R4	15.00%
346100	Larkfield	Comm Equip Non-Telephone	18	R3	0.00%	10	SQ	0.00%
346190	Larkfield	Remote Control & Instrumentati	18	R3	0.00%	10	SQ	0.00%
347000	Larkfield	Misc Equipment	13	S5	0.00%	17	SQ	0.00%
348000	Larkfield	Other Tangible Property	20	R2	0.00%	21	SQ	0.00%

304100	Los Angeles	Struct & Imp SS	26	R4	-5.00%	44	R2.5	-10.00%
304200	Los Angeles	Struct & Imp P	35	S6	-20.00%	35	L0.5	-10.00%
304300	Los Angeles	Struct & Imp WT	50	S6	-5.00%	52	R2.5	-10.00%
304400	Los Angeles	Struct & Imp TD	25	S6	5.00%	25	R2.5	-10.00%
304500	Los Angeles	Struct & Imp AG	44	R4	5.00%	42	R2.5	-5.00%
304600	Los Angeles	Struct & Imp Offices	33	S6	5.00%	21	R2	-5.00%
304700	Los Angeles	Struct & Imp Store,Shop,Gar	33	S6	-5.00%	30	L4	-5.00%
305000	Los Angeles	Collect & Impounding	65	R2	0.00%	65	R2	0.00%
306000	Los Angeles	Lake, River & Other Intakes	40	R3	0.00%	40	R3	0.00%
307000	Los Angeles	Wells & Springs	45	R3	-50.00%	45	R4	-20.00%
309000	Los Angeles	Supply Mains	70	L0	-50.00%	80	R2	-25.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
310000	Los Angeles	Power Generation Equip	22	R1	-15.00%	22	R1	-10.00%
311200	Los Angeles	Pump Equip Electric	28	R1	-10.00%	28	R2	-10.00%
311540	Los Angeles	Pump Equip TD				28	L1	-10.00%
320100	Los Angeles	WT Equip Non-Media	43	S3	-15.00%	37	R1	-10.00%
320190	Los Angeles	320190-WT Equip- Basin, Clearwell	43	S3	-15.00%	5	SQ	-10.00%
320193	Los Angeles	320193-WT Equip- Chemical Feed	43	S3	-15.00%	5	SQ	-10.00%
330000	Los Angeles	Dist Reservoirs & Standpipes	74	R5	-15.00%	75	R2	-25.00%
331001	Los Angeles	TD Mains Not Classified by Siz	75	L2	-50.00%	80	R2	-60.00%
331100	Los Angeles	TD Mains 4in & Less	75	L2	-50.00%	80	R2	-60.00%
331200	Los Angeles	TD Mains 6in to 8in	75	L2	-50.00%	80	R2	-60.00%
331300	Los Angeles	TD Mains 10in to 16in	75	L2	-50.00%	80	R2	-60.00%
331400	Los Angeles	TD Mains 18in & Grtr	75	L2	-50.00%	80	R2	-60.00%
333000	Los Angeles	Services	50	R1	-50.00%	60	S1	-75.00%
334100	Los Angeles	Meters	20	SQ	0.00%	20	SQ	-20.00%
334102	Los Angeles	Meters Greater than 1"	20	SQ	0.00%	15	SQ	-20.00%
334200	Los Angeles	Meter Installations	20	SQ	0.00%	30	R2	-10.00%
334300	Los Angeles	Meter Vaults	NA	NA	NA	30	R2	-10.00%
335000	Los Angeles	Hydrants	52	R1	-30.00%	58	R3	-55.00%
339100	Los Angeles	Other P/E Intangible	22	R1	0.00%	10	SQ	0.00%
339500	Los Angeles	Other P/E TD	40	R2	0.00%	30	SQ	0.00%
340100	Los Angeles	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%
340200	Los Angeles	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%
340300	Los Angeles	Computer Software	7	L2	0.00%	12	SQ	0.00%
340500	Los Angeles	Other Office Equipment	20	L0	0.00%	15	SQ	0.00%
341100	Los Angeles	Trans Equip Lt Duty Trks	11	R1	10.00%	11	S1.5	10.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
341200	Los Angeles	Trans Equip Hvy Duty Trks	11	R1	15.00%	11	L2.5	10.00%
341300	Los Angeles	Trans Equip Autos	11	R1	10.00%	11	L2.5	10.00%
341400	Los Angeles	Trans Equip Other	11	R1	5.00%	11	L2.5	10.00%
342000	Los Angeles	Stores Equipment	30	R1.5	0.00%	30	SQ	0.00%
343000	Los Angeles	Tools,Shop,Garage Equip	28	S6	0.00%	20	SQ	0.00%
344000	Los Angeles	Laboratory Equipment	20	R2	0.00%	20	SQ	0.00%
345000	Los Angeles	Power Operated Equipment	23	S6	15.00%	24	R4	15.00%
346100	Los Angeles	Comm Equip Non-Telephone	18	R3	0.00%	10	SQ	0.00%
346190	Los Angeles	Remote Control & Instrumentati	18	R3	0.00%	10	SQ	0.00%
347000	Los Angeles	Misc Equipment	13	S5	0.00%	17	SQ	0.00%
348000	Los Angeles	Other Tangible Property	20	R2	0.00%	21	SQ	0.00%

304100	Monterey Water	Struct & Imp SS	40	R5	-5.00%	44	R2.5	-10.00%
304200	Monterey Water	Struct & Imp P	65	S1.5	-20.00%	35	L0.5	-10.00%
304300	Monterey Water	Struct & Imp WT	50	R5	-5.00%	52	R2.5	-10.00%
304400	Monterey Water	Struct & Imp TD	25	S1.5	-5.00%	25	R2.5	-10.00%
304500	Monterey Water	Struct & Imp AG	44	R4	-5.00%	42	R2.5	-5.00%
304600	Monterey Water	Struct & Imp Offices	30	R4	-5.00%	21	R2	-5.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
304700	Monterey Water	Struct & Imp Store,Shop,Gar	40	R5	-5.00%	30	L4	-5.00%
304800	Monterey Water	Struct & Imp- Misc	20	R4	-5.00%	20	L0	0.00%
305000	Monterey Water	Collect & Impounding	60	S4	0.00%	65	R2	0.00%
306000	Monterey Water	Lake, River & Other Intakes	40	S4	0.00%	40	R3	0.00%
307000	Monterey Water	Wells & Springs	29	R3	-50.00%	45	R4	-20.00%
309000	Monterey Water	Supply Mains	70	S6	-70.00%	80	R2	-25.00%
310000	Monterey Water	Power Generation Equip	22	R1	-15.00%	22	R1	-10.00%
311200	Monterey Water	Pump Equip Electric	29	L1	-15.00%	28	R2	-10.00%
311300	Monterey Water	Pump Equip-Diesel	29	L1	-15.00%	28	L1	-10.00%
311400	Monterey Water	Pump Equip Hydraulic	29	L1	-15.00%	28	L1	-10.00%
311540	Monterey Water	Pumping Equipment TD	29	L1	-15.00%	28	L1	-10.00%
320100	Monterey Water	WT Equip Non-Media	42	R2	-15.00%	37	R1	-10.00%
320200	Monterey Water	WT Equip Filter Media	10	R2	-5.00%	18	S0.5	-10.00%
330000	Monterey Water	Dist Reservoirs & Standpipes	65	R4	-15.00%	75	R2	-25.00%
330200	Monterey Water	Ground Level Facilities	41	R4	0.00%	75	R2	-25.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
331001	Monterey Water	TD Mains Not Classified by Siz			-70.00%	80	R2	-60.00%
331100	Monterey Water	TD Mains 4in & Less	75	S6	-70.00%	80	R2	-60.00%
331200	Monterey Water	TD Mains 6in to 8in	75	S6	-70.00%	80	R2	-60.00%
331300	Monterey Water	TD Mains 10in to 16in	75	S6	-70.00%	80	R2	-60.00%
331400	Monterey Water	TD Mains 18in & Grtr	75	S6	-70.00%	80	R2	-60.00%
333000	Monterey Water	Services	60	S3	-50.00%	60	S1	-75.00%
334100	Monterey Water	Meters	20	SQ	0.00%	20	SQ	-20.00%
334300	Monterey Water	Meter Vaults	40	R2	0.00%	30	R2	-10.00%
335000	Monterey Water	Hydrants	55	S3	-30.00%	58	R3	-55.00%
339100	Monterey Water	Other P/E Intangible	22	R1	0.00%	10	SQ	0.00%
339200	Monterey Water	Other P/E-Supply	22	R1	0.00%	20	SQ	0.00%
339500	Monterey Water	Other P/E TD	22	R1	0.00%	30	SQ	0.00%
339600	Monterey Water	Other P/E-CPS				7	SQ	0.00%
340100	Monterey Water	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%
340200	Monterey Water	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
340300	Monterey Water	Computer Software	7	L2	0.00%	12	SQ	0.00%
340310	Monterey Water	Main Frame Computer Software	NA	NA		15	SQ	0.00%
340500	Monterey Water	Other Office Equipment	20	L0	0.00%	15	SQ	0.00%
341100	Monterey Water	Trans Equip Lt Duty Trks	11	R1	10.00%	11	S1.5	10.00%
341200	Monterey Water	Trans Equip Hvy Duty Trks	11	R1	15.00%	11	L2.5	10.00%
341300	Monterey Water	Trans Equip Autos	11	R1	10.00%	11	L2.5	10.00%
341400	Monterey Water	Trans Equip Other	11	R1	5.00%	11	L2.5	10.00%
343000	Monterey Water	Tools,Shop,Garage Equip	28	S6	0.00%	20	SQ	0.00%
344000	Monterey Water	Laboratory Equipment	20	R2	0.00%	20	SQ	0.00%
345000	Monterey Water	Power Operated Equipment	23	S6	15.00%	24	R4	15.00%
346100	Monterey Water	Comm Equip Non- Telephone	18	R3	0.00%	10	SQ	0.00%
346190	Monterey Water	Remote Control & Instrumentati	18	R3	0.00%	10	SQ	0.00%
346200	Monterey Water	Comm Equip Telephone	18	R3	0.00%	10	SQ	0.00%
347000	Monterey Water	Misc Equipment	13	S5	0.00%	17	SQ	0.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
304100	Sacramento	Struct & Imp SS	40	R4	0.00%	44	R2.5	-10.00%
304200	Sacramento	Struct & Imp P	65	L3	-20.00%	35	L0.5	-10.00%
304300	Sacramento	Struct & Imp WT	50	L3	0.00%	52	R2.5	-10.00%
304400	Sacramento	Struct & Imp TD	40	L3	0.00%	25	R2.5	-10.00%
304500	Sacramento	Struct & Imp AG	44	R4	-5.00%	42	R2.5	-5.00%
304700	Sacramento	Structure & Imp Leasehold				30	L4	-5.00%
306000	Sacramento	Lake, River & Other Intakes	30	SQ	-5.00%	40	R3	0.00%
307000	Sacramento	Wells & Springs	45	R3	-50.00%	45	R4	-20.00%
309000	Sacramento	Supply Mains	70	R1	-30.00%	80	R2	-25.00%
310000	Sacramento	Power Generation Equip	28	S6	-15.00%	22	R1	-10.00%
311200	Sacramento	Pump Equip Electric	28	S6	-15.00%	28	R2	-10.00%
311400	Sacramento	Pump Equip Hydraulic	28	S6	-15.00%	28	L1	-10.00%
311500	Sacramento	Pump Equip Other	28	S6	-15.00%	28	L1	-10.00%
311540	Sacramento	Pumping Equipment TD	22	R1	-15.00%	28	L1	-10.00%
320100	Sacramento	WT Equip Non-Media	42	R2	-25.00%	37	R1	-10.00%
320200	Sacramento	WT Equip Filter Media	10	R2	-25.00%	18	S0.5	-10.00%
320193	Sacramento	320193-WT Equip- Chemical Feed	43	S3	-15.00%	5	SQ	-10.00%
330000	Sacramento	Dist Reservoirs & Standpipes	65	R4	-15.00%	75	R2	-25.00%
330002	Sacramento	Tank Original Painting				75	R2	-25.00%
330003	Sacramento	Tank Repainting				75	R2	-25.00%
330200	Sacramento	Ground Level Facilities	41	R4	-15.00%	75	R2	-25.00%
330300	Sacramento	Below Grade Facilities	41	R4	-15.00%	75	R2	-25.00%
331001	Sacramento	TD Mains Not Classified by Siz	75	R3	-30.00%	80	R2	-60.00%
331100	Sacramento	TD Mains 4in & Less	75	R3	-30.00%	80	R2	-60.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
331200	Sacramento	TD Mains 6in to 8in	75	R3	-30.00%	80	R2	-60.00%
331300	Sacramento	TD Mains 10in to 16in	75	R3	-30.00%	80	R2	-60.00%
331400	Sacramento	TD Mains 18in & Grtr	75	R3	-30.00%	80	R2	-60.00%
332000	Sacramento	Fire Mains	75	R3	-30.00%	80	R2	-60.00%
333000	Sacramento	Services	50	R3	-50.00%	60	S1	-75.00%
334100	Sacramento	Meters	20	SQ	0.00%	20	SQ	-20.00%
334200	Sacramento	Meter Installations	20	SQ	0.00%	30	R2	-10.00%
335000	Sacramento	Hydrants	55	R3	-30.00%	58	R3	-55.00%
339100	Sacramento	Other P/E Intangible	21	L2	0.00%	10	SQ	0.00%
339600	Sacramento	Other P/E-CPS				7	SQ	0.00%
340100	Sacramento	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%
340200	Sacramento	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%
340300	Sacramento	Computer Software	7	L2	0.00%	12	SQ	0.00%
340500	Sacramento	Other Office Equipment	20	L0	0.00%	15	SQ	0.00%
341100	Sacramento	Trans Equip Lt Duty Trks	7	SQ	10.00%	11	S1.5	10.00%
341200	Sacramento	Trans Equip Hvy Duty Trks	10	R5	15.00%	11	L2.5	10.00%
341300	Sacramento	Trans Equip Autos	7	SQ	10.00%	11	L2.5	10.00%
343000	Sacramento	Tools,Shop,Garage Equip	28	S6	0.00%	20	SQ	0.00%
344000	Sacramento	Laboratory Equipment	20	R2	0.00%	20	SQ	0.00%
345000	Sacramento	Power Operated Equipment	18	R3	15.00%	24	R4	15.00%
346100	Sacramento	Comm Equip Non-Telephone	18	R3	0.00%	10	SQ	0.00%
346190	Sacramento	Remote Control & Instrumentati	18	R3	0.00%	10	SQ	0.00%
346200	Sacramento	Comm Equip Telephone	18	R3	0.00%	10	SQ	0.00%
347000	Sacramento	Misc Equipment	18	R3	0.00%	17	SQ	0.00%
348000	Sacramento	Other Tangible Property	20	R2	0.00%	21	SQ	0.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
354400	Sacramento	WW Struct & Imp Treatment	40	R2	-10.00%	43	R2	-10.00%
361100	Sacramento	WW Collecting Mains	40	R2	0.00%	40	R2	-10.00%
370000	Sacramento	WW Receiving Wells	20	R2	-5.00%	20	R2	-10.00%
380000	Sacramento	WW TD Equipment	40	R2	0.00%	40	R2	-10.00%
397000	Sacramento	WW Misc Equipment	25	R2	0.00%	17	SQ	0.00%
304100	Village	Struct & Imp SS	40	R5	0.00%	44	R2.5	-10.00%
304200	Village	Struct & Imp P	65	R5	-20.00%	35	L0.5	-10.00%
304400	Village	Struct & Imp TD				25	R2.5	-10.00%
304500	Village	Struct & Imp AG	32	R2.5	-5.00%	42	R2.5	-5.00%
304600	Village	Struct & Imp Offices	32	R2.5	-5.00%	21	R2	-5.00%
304620	Village	Struct & Imp-Leasehold				30	R2	-5.00%
304700	Village	Struct & Imp Store,Shop,Gar	32	R2.5	-5.00%	30	L4	-5.00%
306000	Village	Lake, River & Other Intakes	40	R3	0.00%	40	R3	0.00%
309000	Village	Supply Mains	70	R5	-30.00%	80	R2	-25.00%
311200	Village	Pump Equip Electric	27	S6	-15.00%	28	R2	-10.00%
311400	Village	Pump Equip Hydraulic				28	L1	-10.00%
320100	Village	WT Equip Non-Media	42	R2	-15.00%	37	R1	-10.00%
330000	Village	Dist Reservoirs & Standpipes	65	R4	-15.00%	75	R2	-25.00%
330200	Village	Ground Level Facilities	46	S6	-15.00%	75	R2	-25.00%
331001	Village	TD Mains	75	S6		80	R2	-60.00%
331100	Village	TD Mains 4in & Less	75	S6	-30.00%	80	R2	-60.00%
331200	Village	TD Mains 6in to 8in	75	S6	-30.00%	80	R2	-60.00%
331300	Village	TD Mains 10in to 16in	75	S6	-30.00%	80	R2	-60.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
332000	Village	Fire Mains				80	R2	-60.00%
333000	Village	Services	43	S6	-50.00%	60	S1	-75.00%
334100	Village	Meters	20	SQ	0.00%	20	SQ	-20.00%
334200	Village	Meter Installations				30	R2	-10.00%
335000	Village	Hydrants	45	S6	-30.00%	58	R3	-55.00%
339100	Village	Other P/E Intangible	22	L2	0.00%	10	SQ	0.00%
339600	Village	Other P/E-CPS			0.00%	7	SQ	0.00%
340100	Village	Office Furniture & Equip	25	L4	0.00%	21	SQ	0.00%
340200	Village	Comp & Periph Equip	10	L2	0.00%	8	SQ	0.00%
340300	Village	Computer Software	7	L2	0.00%	12	SQ	0.00%
340500	Village	Other Office Equipment	20	L0	0.00%	15	SQ	0.00%
341100	Village	Trans Equip Lt Duty Trks	11	R1	10.00%	11	S1.5	10.00%
341200	Village	Trans Equip Hvy Duty Trks	11	R1	15.00%	11	L2.5	10.00%
341300	Village	Trans Equip Autos	11	R1	10.00%	11	L2.5	10.00%
342000	Village	Stores Equipment	30	R1.5	0.00%	30	SQ	0.00%
343000	Village	Tools,Shop,Garage Equip	28	S6	0.00%	20	SQ	0.00%
345000	Village	Power Operated Equipment	23	S6	15.00%	24	R4	15.00%
346100	Village	Comm Equip Non-Telephone	18	R3	0.00%	10	SQ	0.00%
346190	Village	Remote Control & Instrumentati	18	R3	0.00%	10	SQ	0.00%
347000	Village	Misc Equipment	13	S5	0.00%	17	SQ	0.00%
348000	Village	Other Tangible Property	20	R2	0.00%	21	SQ	0.00%

354400	Monterey WW	WW Struct & Imp Treatment	40	R2	-10.00%	40	R2	-10.00%
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**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
355400	Monterey WW	WW Pwr Gen Equip Treatment				24	S3	-10.00%
360000	Monterey WW	WW Collection Sewers Forced	40	R2	-10.00%	60	R2	-10.00%
361100	Monterey WW	WW Collecting Mains	40	R2	0.00%	60	R2	0.00%
363000	Monterey WW	WW Services Sewer	40	R2	0.00%	60	R2	0.00%
370000	Monterey WW	WW Receiving Wells	20	R2	-5.00%	60	R2	-5.00%
371100	Monterey WW	WW Pump Equip Elect	30	R1	-5.00%	30	R1	-5.00%
371200	Monterey WW	WW Pump Equip Oth Pwr	20	R2	0.00%	20	R2	0.00%
380000	Monterey WW	WW TD Equipment	40	R2	0.00%	40	R2	0.00%
380100	Monterey WW	WW TD Equip Sed Tanks/Acc	40	R2	-5.00%	40	R2	-5.00%
380200	Monterey WW	WW TD Equip Sed Tanks/Acc	40	R2	-5.00%	40	R2	-5.00%
380300	Monterey WW	WW TD Equip Sldge Dry/Filt	40	R2	-5.00%	40	R2	-5.00%
380450	Monterey WW	WW TD Equip Oth Sew Rem	40	R2	-5.00%	40	R2	-5.00%
380600	Monterey WW	WW TD Equip Oth Disp	40	R2	-5.00%	40	R2	-5.00%
380625	Monterey WW	WW TD Equip Gen Trmt	40	R2	-5.00%	40	R2	-5.00%
381000	Monterey WW	WW Plant Sewers	40	R2	-5.00%	40	R2	-5.00%

**CALIFORNIA AMERICAN WATER
SUMMARY OF EXISTING AND PROPOSED
DEPRECIATION PARAMETERS**

Account	District	Account Description	Existing ASL	Existing Curve	Existing Net Salvage %	Proposed ASL	Proposed Curve	Proposed Net Salvage
382000	Monterey WW	WW Outfall Sewer Lines	40	R2	-5.00%	40	R2	-5.00%
389100	Monterey WW	WW Oth Plt & Misc Eqp Intang	40	R2	-5.00%	10	SQ	0.00%
389600	Monterey WW	WW Other P/E - CPS	40	R2	0.00%	7	SQ	0.00%
390000	Monterey WW	WW Office Furniture & Equip	25	L2	0.00%	21	SQ	0.00%
390200	Monterey WW	WW Computers & Peripheral	7	R2	0.00%	8	SQ	0.00%
391200	Monterey WW	WW Trans Equip Hvy Dty Trks	7	R2	0.00%	16	L2.5	10.00%
393000	Monterey WW	WW Tool Shop & Garage Equip				20	SQ	0.00%
394000	Monterey WW	WW Laboratory Equipment	25	L0	0.00%	20	SQ	0.00%
395000	Monterey WW	WW Power Operated Equip	25	L0	10.00%	24	R4	15.00%
39600	Monterey WW	WW Communication Equip				10	SQ	0.00%
397000	Monterey WW	WW Misc Equipment	25	R2	0.00%	17	SQ	0.00%
		Leaseback Vehcles	NA	NA	NA	5	SQ	0.00%

APPENDIX D
Net Salvage Analysis

CALIFORNIA AMERICAN WATER
Water Operations
Net Salvage Analysis

Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
304100	2008	34,246.19	0.00	0.00	0.00	0.00%										
304100	2009	1,921.42	0.00	0.00	0.00	0.00%	0.00%									
304100	2010	4,267.02	0.00	5,955.39	(5,955.39)	-139.57%	-96.23%	-14.73%								
304100	2011	3,811.28	0.00	4,393.63	(4,393.63)	-115.28%	-128.11%	-103.49%	-23.39%							
304100	2012	849.65	0.00	1,750.00	(1,750.00)	-205.97%	-131.81%	-135.52%	-111.52%	-26.83%						
304100	2013	536.39	0.00	8,048.94	(8,048.94)	-1500.58%	-706.97%	-273.07%	-212.88%	-176.96%	-44.15%					
304100	2014	25,119.41	0.00	26,560.28	(26,560.28)	-105.74%	-134.90%	-137.18%	-134.42%	-135.06%	-127.95%	-66.02%				
304100	2015	0.00	0.00	2,495.70	(2,495.70)	NA	-115.67%	-144.63%	-146.59%	-142.66%	-142.27%	-134.79%	-69.54%			
304100	2016	2,111.36	0.00	49,221.02	(49,221.02)	-2331.25%	-2449.45%	-287.46%	-310.89%	-307.78%	-285.15%	-268.22%	-254.88%	-135.08%		
304100	2017	0.00	0.00	2,877.83	(2,877.83)	NA	-2467.55%	-2585.75%	-298.03%	-321.26%	-317.83%	-294.03%	-276.07%	-262.33%	-139.03%	
304100	2018	122,175.26	0.00	85,873.48	(85,873.48)	-70.29%	-72.64%	-111.01%	-113.02%	-111.79%	-116.76%	-117.27%	-117.22%	-117.82%	-116.41%	
304100	2019	2,441.56	0.00	6,261.75	(6,261.75)	-256.47%	-73.93%	-76.24%	-113.81%	-115.78%	-114.12%	-119.00%	-119.48%	-119.38%	-119.92%	
304100	2020	87,829.43	0.00	15,914.63	(15,914.63)	-18.12%	-24.57%	-50.86%	-52.21%	-74.64%	-75.80%	-78.94%	-82.12%	-82.55%	-83.06%	
304200	2004	4,384.43	0.00	787.50	(787.50)	-17.96%										
304200	2005	0.00	0.00	0.00	0.00	NA	-17.96%									
304200	2006	4,075.00	0.00	0.00	0.00	0.00%	0.00%	-9.31%								
304200	2007	9,702.41	0.00	0.00	0.00	0.00%	0.00%	0.00%	-4.34%							
304200	2008	1,250,314.32	0.00	1,375.00	(1,375.00)	-0.11%	-0.11%	-0.11%	-0.11%	-0.17%						
304200	2009	31,492.23	0.00	0.00	0.00	0.00%	-0.11%	-0.11%	-0.11%	-0.11%	-0.17%					
304200	2010	20,712.50	0.00	105,237.58	(105,237.58)	-508.09%	-201.59%	-8.19%	-8.12%	-8.10%	-8.10%	-8.13%				
304200	2011	13,479.68	0.00	23,645.91	(23,645.91)	-175.42%	-376.94%	-196.22%	-9.90%	-9.83%	-9.80%	-9.80%	-9.82%			
304200	2012	73,571.77	0.00	14,954.71	(14,954.71)	-20.33%	-44.34%	-133.48%	-103.29%	-10.45%	-10.38%	-10.35%	-10.35%	-10.37%		
304200	2013	3,197.89	0.00	5,106.19	(5,106.19)	-159.67%	-26.13%	-48.43%	-134.23%	-104.56%	-10.79%	-10.72%	-10.69%	-10.69%	-10.71%	
304200	2014	1,465,863.77	0.00	33,843.94	(33,843.94)	-2.31%	-2.65%	-3.49%	-4.98%	-11.59%	-11.37%	-6.44%	-6.42%	-6.41%	-6.41%	
304200	2015	25,196.93	0.00	5,602.30	(5,602.30)	-22.23%	-2.65%	-2.98%	-3.80%	-5.26%	-11.76%	-11.53%	-6.58%	-6.56%	-6.55%	
304200	2016	85,284.30	0.00	120,554.23	(120,554.23)	-141.36%	-114.19%	-10.15%	-10.45%	-10.89%	-12.22%	-18.31%	-17.97%	-10.45%	-10.42%	
304200	2017	6,088.41	0.00	5,487.66	(5,487.66)	-90.13%	-137.94%	-112.93%	-10.46%	-10.76%	-11.18%	-12.51%	-18.57%	-18.23%	-10.61%	
304200	2018	162,940.45	0.00	222,496.20	(222,496.20)	-136.55%	-134.88%	-137.05%	-126.70%	-22.23%	-22.48%	-22.39%	-23.52%	-28.92%	-28.44%	-17.08%
304200	2019	36,707.59	0.00	151,709.34	(151,709.34)	-413.29%	-187.43%	-184.55%	-171.89%	-159.97%	-30.28%	-30.52%	-30.11%	-31.16%	-36.38%	-21.64%
304200	2020	88,270.22	0.00	14,207.01	(14,207.01)	-16.09%	-132.76%	-134.90%	-133.98%	-135.64%	-128.57%	-29.61%	-29.84%	-29.48%	-30.48%	-21.49%
304300	2006	622.00	0.00	0.00	0.00	0.00%										
304300	2007	4,713.99	0.00	0.00	0.00	0.00%	0.00%									
304300	2008	153,876.13	0.00	0.00	0.00	0.00%	0.00%	0.00%								
304300	2009	4,774.36	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
304300	2010	59,545.63	0.00	63,335.87	(63,335.87)	-106.37%	-98.47%	-29.03%	-28.41%	-28.33%						
304300	2011	51,694.90	0.00	27,377.64	(27,377.64)	-52.96%	-81.55%	-78.19%	-33.61%	-33.03%	-32.96%					
304300	2012	22,953.44	0.00	33,161.41	(33,161.41)	-144.47%	-81.10%	-92.31%	-89.14%	-42.30%	-41.63%	-41.54%				
304300	2013	19,799.38	0.00	22,373.11	(22,373.11)	-113.00%	-129.90%	-87.79%	-94.97%	-92.11%	-46.78%		-45.99%			
304300	2014	419,677.89	0.00	2,079.16	(2,079.16)	-0.50%	-5.56%	-12.46%	-16.53%	-25.86%	-25.64%	-20.25%	-20.12%	-20.11%		
304300	2015	37,514.50	0.00	5,207.39	(5,207.39)	-13.88%	-1.59%	-6.22%	-12.57%	-16.35%	-25.12%	-24.93%	-19.94%	-19.82%	-19.81%	
304300	2016	33,500.38	0.00	18,308.61	(18,308.61)	-54.65%	-33.11%	-5.22%	-9.40%	-15.21%	-18.54%	-26.66%	-26.46%	-21.39%	-21.27%	
304300	2017	14,368.30	0.00	12,975.09	(12,975.09)	-90.30%	-65.35%	-42.74%	-7.64%	-11.61%	-17.18%	-20.26%	-28.04%	-27.84%	-22.60%	
304300	2018	141,208.84	0.00	73,838.61	(73,838.61)	-52.29%	-55.80%	-55.60%	-48.69%	-17.39%	-20.24%	-24.37%	-26.37%	-32.32%	-32.13%	
304300	2019	22,593.71	0.00	636,902.41	(636,902.41)	-2818.94%	-433.90%	-406.19%	-350.56%	-299.87%	-112.03%	-113.10%	-113.10%	-109.03%	-108.84%	
304300	2020	3,469.02	0.00	18,067.60	(18,067.60)	-520.83%	-2513.05%	-435.70%	-408.38%	-353.30%	-302.90%	-114.14%	-114.10%	-115.08%	-110.89%	-92.26%
304400	2008	74,945.93	0.00	0.00	0.00	0.00%										
304400	2009	0.00	0.00	0.00	0.00	NA	0.00%									
304400	2010	0.00	0.00	0.00	0.00	NA	NA	0.00%								
304400	2011	636.41	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
304400	2012	0.00	0.00	12,598.74	(12,598.74)	NA	-1979.66%	-1979.66%	-1979.66%	-16.67%						
304400	2013	0.00	0.00	3,000.00	(3,000.00)	NA	NA	-2451.05%	-2451.05%	-2451.05%	-20.64%					
304400	2014	1,537.00	0.00	2,582.49	(2,582.49)	-168.02%	-363.21%	-1182.90%	-836.53%	-836.53%	-836.53%	-23.58%				
304400	2015	0.00	0.00	14,249.27	(14,249.27)	NA	-1095.10%	-1290.29%	-2109.99%	-1492.15%	-1492.15%	-1492.15%	-42.05%			

CALIFORNIA AMERICAN WATER
Water Operations
Net Salvage Analysis

Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
304400	2016	0.00	0.00	1,752.16	(1,752.16)	NA	NA	-1209.10%	-1404.29%	-2223.99%	-1572.77%	-1572.77%	-1572.77%	-44.32%		
304400	2017	9,352.40	0.00	1,254.00	(1,254.00)	-13.41%	-32.14%	-184.50%	-182.18%	-209.73%	-325.42%	-307.45%	-307.45%	-307.45%	-40.98%	
304400	2018	12,970.98	0.00	6,809.72	(6,809.72)	-52.50%	-36.12%	-43.97%	-107.80%	-111.68%	-124.25%	-177.06%	-172.46%	-172.46%	-172.46%	
304400	2019	87,757.69	0.00	97,253.71	(97,253.71)	-110.82%	-103.31%	-95.67%	-97.26%	-110.21%	-111.00%	-113.69%	-124.98%	-124.27%	-124.27%	
304400	2020	2,031.86	0.00	5,373.02	(5,373.02)	-264.44%	-114.30%	-106.50%	-98.73%	-100.29%	-113.00%	-113.75%	-116.39%	-127.47%	-126.76%	
304500	2004	33,873.29	0.00	0.00	0.00	0.00%										
304500	2005	0.00	0.00	0.00	0.00	NA	0.00%									
304500	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
304500	2007	36,028.39	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
304500	2008	18,767.88	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
304500	2009	1,226.19	0.00	1,500.00	(1,500.00)	-122.33%	-7.50%	-2.68%	-2.68%	-2.68%	-1.67%					
304500	2010	1,287.58	0.00	1,482.61	(1,482.61)	-115.15%	-118.65%	-14.01%	-5.20%	-5.20%	-5.20%	-3.27%				
304500	2011	1,016.84	0.00	8.96	(8.96)	-0.88%	-64.73%	-84.73%	-13.42%	-5.13%	-5.13%	-5.13%	-3.24%			
304500	2012	6,915.99	0.00	323.25	(323.25)	-4.67%	-4.19%	-19.68%	-31.73%	-11.35%	-5.08%	-5.08%	-5.08%	-3.34%		
304500	2013	468.19	0.00	0.00	0.00	0.00%	-4.38%	-3.95%	-18.73%	-30.37%	-11.17%	-5.04%	-5.04%	-5.04%	-3.33%	
304500	2014	221,477.45	0.00	12,258.36	(12,258.36)	-5.53%	-5.52%	-5.50%	-5.48%	-6.09%	-6.70%	-6.20%	-5.42%	-5.42%	-5.42%	
304500	2015	1,121.31	0.00	1,115.89	(1,115.89)	-99.52%	-6.01%	-6.00%	-5.96%	-5.93%	-6.54%	-7.15%	-6.62%	-5.79%	-5.79%	
304500	2016	1,463.23	0.00	467.72	(467.72)	-31.96%	-61.27%	-6.18%	-6.16%	-6.12%	-6.10%	-6.70%	-7.30%	-6.76%	-5.92%	
304500	2017	5,128.82	0.00	2,752.78	(2,752.78)	-53.67%	-48.85%	-56.22%	-7.24%	-7.23%	-7.15%	-7.12%	-7.71%	-8.29%	-7.69%	
304500	2018	20,526.47	0.00	1,012.53	(1,012.53)	-4.93%	-14.68%	-15.61%	-18.94%	-7.05%	-7.04%	-6.97%	-6.95%	-7.49%	-8.03%	-5.99%
304500	2019	64,477.62	0.00	1,381.94	(1,381.94)	-2.14%	-2.82%	-5.71%	-6.13%	-7.26%	-6.04%	-6.03%	-6.01%	-5.99%	-6.42%	-5.87%
304500	2020	9,660.06	0.00	2,265.99	(2,265.99)	-23.46%	-4.92%	-4.92%	-7.43%	-7.78%	-8.79%	-6.56%	-6.55%	-6.51%	-6.50%	-6.31%
304600	2004	121,606.51	0.00	0.00	0.00	0.00%										
304600	2005	0.00	0.00	0.00	0.00	NA	0.00%									
304600	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
304600	2007	93,683.30	0.00	8,418.79	(8,418.79)	-8.99%	-8.99%	-8.99%	-3.91%							
304600	2008	3,556.17	0.00	0.00	0.00	0.00%	-8.66%	-8.66%		-3.85%						
304600	2009	2,122.01	0.00	0.00	0.00	0.00%	0.00%	-8.47%	-8.47%	-8.47%	-3.81%					
304600	2010	4,636.88	0.00	0.00	0.00	0.00%	0.00%	0.00%	-8.10%	-8.10%	-8.10%	-3.73%				
304600	2011	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	-8.10%	-8.10%	-8.10%	-3.73%			
304600	2012	8,669.29	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	-7.47%	-7.47%	-7.47%	-3.59%		
304600	2013	3,523.45	0.00	5,711.08	(5,711.08)	-162.09%	-46.84%	-46.84%	-33.93%	-30.14%	-25.37%	-12.16%	-12.16%	-12.16%	-5.94%	
304600	2014	416,896.19	0.00	393.42	(393.42)	-0.09%	-1.45%	-1.42%	-1.42%	-1.41%	-1.40%	-1.39%	-2.72%	-2.72%	-2.72%	
304600	2015	9,567.93	0.00	11,065.09	(11,065.09)	-115.65%	-2.69%	-3.99%	-3.91%	-3.91%	-3.87%	-3.85%	-3.82%	-4.72%	-4.72%	
304600	2016	10,285.00	0.00	1,770.12	(1,770.12)	-17.21%	-64.65%	-3.03%	-4.30%	-4.22%	-4.22%	-4.18%	-4.16%	-4.12%	-4.95%	
304600	2017	9,763.52	0.00	3,139.84	(3,139.84)	-32.16%	-24.49%	-53.94%	-3.67%	-4.91%	-4.81%	-4.81%	-4.77%	-4.74%	-4.71%	
304600	2018	6,989.96	0.00	10,756.24	(10,756.24)	-153.88%	-82.94%	-57.94%	-73.02%	-5.98%	-7.18%	-7.05%	-7.05%	-6.98%	-6.95%	-5.97%
304600	2019	0.00	0.00	0.00	0.00	NA	-153.88%	-82.94%	-57.94%	-73.02%	-5.98%	-7.18%	-7.05%	-7.05%	-6.98%	-7.24%
304600	2020	34,307.71	0.00	6,819.86	(6,819.86)	-19.88%	-19.88%	-42.56%	-40.57%	-36.65%	-47.31%	-6.96%	-8.07%	-7.93%	-7.93%	-7.96%
304620	2011	392.05	0.00	0.00	0.00	0.00%										
304620	2012	0.00	0.00	0.00	0.00	NA	0.00%									
304620	2013	0.00	0.00	0.00	0.00	NA	NA	0.00%								
304620	2014	0.00	0.00	2,574.87	(2,574.87)	NA	NA	NA	-656.77%							
304620	2015	0.00	0.00	0.00	0.00	NA	NA	NA	NA	-656.77%						
304620	2016	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	-656.77%					
304620	2017	850.87	0.00	92.40	(92.40)	-10.86%	-10.86%	-10.86%	-313.48%	-313.48%	-313.48%	-214.60%				
304620	2018	116,098.28	0.00	0.00	0.00	0.00%	-0.08%	-0.08%	-0.08%	-2.28%	-2.28%	-2.28%	-2.27%			
304620	2019	0.00	0.00	0.00	0.00	NA	0.00%	-0.08%	-0.08%	-0.08%	-2.28%	-2.28%	-2.28%	-2.27%		
304620	2020	0.00	0.00	0.00	0.00	NA	NA	0.00%	-0.08%	-0.08%	-0.08%	-2.28%	-2.28%	-2.28%	-2.27%	
304700	2004	1,070.74	0.00	17,118.01	(17,118.01)	-1598.71%										
304700	2005	0.00	0.00	0.00	0.00	NA	-1598.71%									
304700	2006	0.00	0.00	0.00	0.00	NA	NA	-1598.71%								
304700	2007	668.34	0.00	0.00	0.00	0.00%	0.00%	0.00%	-984.31%							

	Activity		Gross	Cost of	Net	Net	2- yr	3- yr	4- yr	5- yr	6- yr	7- yr	8- yr	9- yr	10- yr	15- yr
Account	Year	Retirement	Salvage	Removal	Salvage	Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %
304700	2008	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	-984.31%					
304700	2009	3,987.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	-298.95%					
304700	2010	886.80	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-258.86%				
304700	2011	1,386.52	0.00	1,054.88	(1,054.88)	-76.08%	-46.40%	-16.85%	-16.85%	-15.22%	-15.22%	-15.22%	-227.18%			
304700	2012	243.61	0.00	0.00	0.00	0.00%	-64.71%	-41.91%	-16.22%	-16.22%	-14.71%	-14.71%	-14.71%	-220.46%		
304700	2013	800.00	0.00	835.57	(835.57)	-104.45%	-80.07%	-77.79%	-56.99%	-25.88%	-25.88%	-23.71%	-23.71%	-23.71%	-210.20%	
304700	2014	362,214.30	0.00	7,390.00	(7,390.00)	-2.04%	-2.27%	-2.26%	-2.55%	-2.54%	-2.51%	-2.51%	-2.51%	-2.51%	-2.51%	
304700	2015	0.00	0.00	5,447.50	(5,447.50)	NA	-3.54%	-3.77%	-3.76%	-4.04%	-4.03%	-3.99%	-3.99%	-3.98%	-3.98%	
304700	2016	0.00	0.00	2,069.71	(2,069.71)	NA	NA	-4.12%	-4.34%	-4.33%	-4.61%	-4.60%	-4.55%	-4.55%	-4.54%	
304700	2017	3,061.92	0.00	107.20	(107.20)	-3.50%	-71.10%	-249.01%	-4.11%	-4.33%	-4.33%	-4.60%	-4.59%	-4.54%	-4.54%	
304700	2018	116.38	0.00	6,593.59	(6,593.59)	-5665.57%	-210.83%	-275.95%	-447.35%	-5.91%	-6.13%	-6.12%	-6.39%	-6.37%	-6.30%	-10.85%
304700	2019	204.08	0.00	755.24	(755.24)	-370.07%	-2293.21%	-220.44%	-281.63%	-442.68%	-6.12%	-6.33%	-6.33%	-6.59%	-6.57%	-6.49%
304700	2020		0.00	0.00	0.00	NA	-370.07%	-2293.21%	-220.44%	-281.63%	-442.68%	-6.12%	-6.33%	-6.33%	-6.59%	-6.49%
304800	2008	304,800.00	0.00	0.00	0.00	0.00%										
304800	2009	0.00	0.00	0.00	0.00	NA	0.00%									
304800	2010	0.00	0.00	0.00	0.00	NA	NA	0.00%								
304800	2011	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%							
304800	2012	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%						
304800	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%					
304800	2014	12,840.37	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
304800	2015	10,246.19	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
304800	2016	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
304800	2017	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
304800	2018	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
304800	2019	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
304800	2020	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	
305000	2004	973.85	0.00	0.00	0.00	0.00%										
305000	2005	0.00	0.00	0.00	0.00	NA	0.00%									
305000	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
305000	2007	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%							
305000	2008	231,456.24	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
305000	2009	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%					
305000	2010	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%				
305000	2011	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%			
305000	2012	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%		
305000	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	
305000	2014	371,690.05	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
305000	2015	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
305000	2016	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
305000	2017	23,000.00	0.00	55,538.06	(55,538.06)	-241.47%	-241.47%	-241.47%	-14.07%	-14.07%	-14.07%	-14.07%	-14.07%	-14.07%	-8.87%	
305000	2018	0.00	0.00	0.00	0.00	NA	-241.47%	-241.47%	-241.47%	-14.07%	-14.07%	-14.07%	-14.07%	-14.07%	-14.07%	-8.86%
305000	2019	0.00	0.00	0.00	0.00	NA	NA	-241.47%	-241.47%	-241.47%	-14.07%	-14.07%	-14.07%	-14.07%	-14.07%	-8.87%
305000	2020	562,283.69	0.00	0.00	0.00	0.00%	0.00%	0.00%	-9.49%	-9.49%	-9.49%	-5.80%	-5.80%	-5.80%	-5.80%	-4.67%
306000	2008	6,236.61	0.00	0.00	0.00	0.00%										
306000	2009	9,013.43	0.00	0.00	0.00	0.00%	0.00%									
306000	2010	0.00	0.00	0.00	0.00	NA	0.00%	0.00%								
306000	2011	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%							
306000	2012	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%	0.00%						
306000	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%	0.00%					
306000	2014	97,283.44	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
306000	2015	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
306000	2016	1,189.52	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
306000	2017	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
306000	2018	271.65	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

CALIFORNIA AMERICAN WATER
Water Operations
Net Salvage Analysis

Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
306000	2019	30,883.81	0.00	81,110.33	(81,110.33)	-262.63%	-260.34%	-260.34%	-250.77%	-250.77%	-62.57%	-62.57%	-62.57%	-62.57%	-62.57%	
306000	2020	(24,083.61)	0.00	(64,888.28)	64,888.28	-269.43%	-238.55%	-229.39%	-229.39%	-196.36%	-196.36%	-15.37%	-15.37%	-15.37%	-15.37%	
307000	2004	248,831.71	0.00	1,838.25	(1,838.25)	-0.74%										
307000	2005	26,901.28	0.00	39,714.31	(39,714.31)	-147.63%	-15.07%									
307000	2006	55,842.09	0.00	68,785.13	(68,785.13)	-123.18%	-131.13%	-33.28%								
307000	2007	30,628.53	0.00	5,140.18	(5,140.18)	-16.78%	-85.49%	-100.24%	-31.88%							
307000	2008	20,534.67	0.00	29,473.57	(29,473.57)	-143.53%	-67.65%	-96.63%	-106.88%	-37.87%						
307000	2009	51,740.97	0.00	6,693.03	(6,693.03)	-12.94%	-50.04%	-40.14%	-69.35%	-80.69%	-34.90%					
307000	2010	168,022.58	0.00	168,724.53	(168,724.53)	-100.42%	-79.82%	-85.27%	-77.52%	-85.33%	-90.06%	-53.17%				
307000	2011	98,655.55	0.00	161,598.03	(161,598.03)	-163.80%	-123.87%	-105.84%	-108.12%	-100.55%	-103.52%	-106.15%	-68.74%			
307000	2012	237,938.57	0.00	137,735.09	(137,735.09)	-57.89%	-88.93%	-92.76%	-85.33%	-87.40%	-83.84%	-87.15%	-89.51%	-65.99%		
307000	2013	38,932.38	0.00	41,947.07	(41,947.07)	-107.74%	-64.90%	-90.88%	-93.83%	-86.80%	-88.69%	-85.28%	-88.30%	-90.48%	-67.65%	
307000	2014	1,138,855.36	0.00	44,164.88	(44,164.88)	-3.88%	-7.31%	-15.81%	-25.45%	-32.94%	-32.34%	-33.64%	-33.35%	-36.08%	-37.69%	
307000	2015	232,337.15	0.00	98,091.27	(98,091.27)	-42.22%	-10.37%	-13.06%	-19.53%	-27.68%	-34.07%	-33.51%	-34.65%	-34.38%	-36.77%	
307000	2016	22,492.85	0.00	20,813.44	(20,813.44)	-92.53%	-46.66%	-11.70%	-14.31%	-20.52%	-28.51%	-34.74%	-34.18%	-35.29%	-35.02%	
307000	2017	149,341.49	0.00	35,840.71	(35,840.71)	-24.00%	-32.97%	-38.29%	-12.89%	-15.23%	-20.80%	-28.16%	-33.98%	-33.47%	-34.51%	
307000	2018	988,727.59	0.00	96,515.40	(96,515.40)	-9.76%	-11.63%	-13.20%	-18.04%	-11.67%	-13.12%	-16.92%	-21.90%	-26.19%	-25.97%	-27.27%
307000	2019	287,993.90	0.00	978,519.87	(978,519.87)	-339.77%	-84.20%	-77.90%	-78.13%	-73.16%	-45.18%	-46.03%	-46.94%	-50.55%	-53.04%	-54.49%
307000	2020	175,927.07	0.00	613,081.41	(613,081.41)	-348.49%	-343.08%	-116.21%	-107.61%	-107.40%	-99.25%	-62.99%	-63.57%	-63.15%	-66.10%	-67.80%
309000	2009	0.00	0.00	1,800.00	(1,800.00)	NA										
309000	2010	1,287.00	0.00	0.00	0.00	0.00%	-139.86%									
309000	2011	0.00	0.00	26,067.40	(26,067.40)	NA	-2025.44%	-2165.30%								
309000	2012	0.00	0.00	2,540.03	(2,540.03)	NA	NA	-2222.80%	-2362.66%							
309000	2013	126,940.70	0.00	0.00	0.00	0.00%	-2.00%	-22.54%	-22.31%	-23.71%						
309000	2014	52,873.29	0.00	2,576.04	(2,576.04)	-4.87%	-1.43%	-2.85%	-17.34%	-17.22%	-18.21%					
309000	2015	1,381.26	0.00	6,796.63	(6,796.63)	-492.06%	-17.28%	-5.17%	-6.57%	-20.96%	-20.81%	-21.80%				
309000	2016		0.00	191.81	(191.81)	NA	-505.95%	-17.63%	-5.28%	-6.68%	-21.07%	-20.92%	-21.90%			
309000	2017	388.24	0.00	8,617.26	(8,617.26)	-2219.57%	-2268.98%	-881.93%	-33.27%	-10.01%	-11.41%	-25.77%	-25.59%	-26.57%		
309000	2018	6,050.32	0.00	0.00	0.00	0.00%	-133.84%	-136.82%	-199.57%	-29.96%	-9.69%	-11.04%	-24.94%	-24.77%	-25.72%	
309000	2019	0.00	0.00	0.00	0.00	NA	0.00%	-136.84%	-199.57%	-29.96%	-29.96%	-9.69%	-11.04%	-24.94%	-24.77%	
309000	2020	0.00	0.00	0.00	0.00	NA	NA	0.00%	-133.84%	-136.82%	-199.57%	-29.96%	-9.69%	-11.04%	-24.94%	
310000	2009	0.00	0.00	0.00	0.00	NA										
310000	2010	2,160.07	0.00	6,976.54	(6,976.54)	-322.98%	-322.98%									
310000	2011	12,500.77	0.00	1,779.47	(1,779.47)	-14.23%	-59.72%	-59.72%								
310000	2012	12,993.75	0.00	931.71	(931.71)	-7.17%	-10.63%	-35.03%	-35.03%							
310000	2013	0.00	0.00	(1,101.81)	1,101.81	NA	1.31%	-6.31%	-31.05%	-31.05%						
310000	2014	8,967.33	0.00	5,570.50	(5,570.50)	-62.12%	-49.83%	-24.59%	-20.83%	-38.66%	-38.66%					
310000	2015	0.01	0.00	315.01	(315.01)	-3150100.00%	-65.63%	-53.35%	-26.03%	-21.75%	-39.52%	-39.52%				
310000	2016	85,506.25	0.00	11,976.14	(11,976.14)	-14.01%	-14.37%	-18.91%	-17.74%	-16.46%	-16.23%	-21.66%	-21.66%			
310000	2017	14,850.17	0.00	1,396.66	(1,396.66)	-9.41%	-13.33%	-13.64%	-17.62%	-16.61%	-15.61%	-15.48%	-20.33%	-20.33%		
310000	2018	34,676.01	0.00	5,966.07	(5,966.07)	-17.21%	-14.87%	-14.32%	-14.55%	-17.52%	-16.75%	-15.96%	-15.83%	-19.70%	-19.70%	
310000	2019	10,576.92	0.00	54,806.77	(54,806.77)	-518.17%	-134.30%	-103.44%	-50.92%	-51.14%	-51.77%	-51.06%	-47.66%	-45.34%	-48.63%	
310000	2020	0.00	0.00	0.00	0.00	NA	-518.17%	-134.30%	-103.44%	-50.92%	-51.14%	-51.77%	-51.06%	-47.66%	-45.34%	
311200	2004	1,338,511.86	0.00	19,611.37	(19,611.37)	-1.47%										
311200	2005	148,308.51	0.00	19,886.74	(19,886.74)	-13.41%	-2.66%									
311200	2006	138,408.67	0.00	26,676.31	(26,676.31)	-19.27%	-16.24%	-4.07%								
311200	2007	68,788.26	0.00	3,812.82	(3,812.82)	-5.54%	-14.72%	-14.17%	-4.13%							
311200	2008	627,643.57	0.00	39,372.48	(39,372.48)	-6.27%	-6.20%	-8.37%		-4.71%						
311200	2009	268,652.07	0.00	99,576.56	(99,576.56)	-37.07%	-15.50%	-14.79%	-15.35%	-15.12%	-8.07%					
311200	2010	327,733.04	0.00	250,958.26	(250,958.26)	-76.57%	-58.78%	-31.85%	-30.45%	-29.37%	-27.87%	-15.76%				
311200	2011	491,021.70	0.00	118,485.80	(118,485.80)	-24.13%	-45.12%	-43.13%	-29.64%	-28.71%	-28.03%	-26.99%	-16.97%			
311200	2012	393,602.28	0.00	94,056.93	(94,056.93)	-23.90%	-24.03%	-38.23%	-38.02%	-28.57%	-27.84%	-27.33%	-26.49%	-17.68%		
311200	2013	488,145.86	0.00	133,689.93	(133,689.93)	-27.39%	-25.83%	-25.22%	-35.12%	-35.38%	-28.35%	-27.76%	-27.34%	-26.64%	-18.79%	

CALIFORNIA AMERICAN WATER
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Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
311200	2014	6,952,783.98	0.00	166,407.06	(166,407.06)	-2.39%	-4.03%	-5.03%	-6.16%	-8.82%	-9.67%	-9.45%	-9.42%	-9.56%	-9.62%	
311200	2015	384,076.02	0.00	197,733.66	(197,733.66)	-51.48%	-4.96%	-6.36%	-7.20%	-8.16%	-10.64%	-11.40%	-11.08%	-11.04%	-11.15%	
311200	2016	1,048,016.00	0.00	415,284.79	(415,284.79)	-39.63%	-42.81%	-9.30%	-10.29%	-10.87%	-11.54%	-13.65%	-14.26%	-13.80%	-13.75%	
311200	2017	304,540.20	0.00	138,599.00	(138,599.00)	-45.51%	-40.95%	-43.28%	-10.56%	-11.46%	-11.97%	-12.56%	-14.58%	-15.15%	-14.66%	
311200	2018	1,089,195.59	2,367.81	491,956.51	(489,588.70)	-44.95%	-45.07%	-42.73%	-43.92%	-14.39%	-15.01%	-15.34%	-15.73%	-17.46%	-17.91%	-15.73%
311200	2019	406,210.59	0.00	213,217.41	(213,217.41)	-42.49%	-47.00%	-46.75%	-44.13%	-45.00%	-15.91%	-16.44%	-16.70%	-17.02%	-18.66%	-18.32%
311200	2020	667,206.92	0.00	114,066.98	(114,066.98)	-17.10%	-30.49%	-37.77%	-38.73%	-39.00%	-40.23%	-15.99%	-16.48%	-16.73%	-17.02%	-18.32%
311300	2015	0.00	0.00	0.00	0.00	NA										
311300	2016	0.00	0.00	0.00	0.00	NA	NA									
311300	2017	0.00	0.00	0.00	0.00	NA	NA	NA								
311300	2018	385.40	0.00	70.21	(70.21)	-18.22%	-18.22%	-18.22%	-18.22%							
311300	2019	0.00	0.00	0.00	0.00	NA	-18.22%	-18.22%	-18.22%	-18.22%						
311300	2020	0.00	0.00	0.00	0.00	NA	NA	-18.22%	-18.22%	-18.22%	-18.22%					
311400	2009	0.00	0.00	(1,240.06)	1,240.06	NA										
311400	2010	0.00	0.00	0.00	0.00	NA	NA									
311400	2011	0.00	0.00	0.00	0.00	NA	NA	NA								
311400	2012	0.00	0.00	0.00	0.00	NA	NA	NA	NA							
311400	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA						
311400	2014	15,590.01	0.00	311.91	(311.91)	-2.00%	-2.00%	-2.00%	-2.00%	-2.00%	5.95%					
311400	2015	0.01	0.00	2,271.22	(2,271.22)	-22712200.00%	-16.57%	-16.57%	-16.57%	-16.57%	-16.57%	-8.61%				
311400	2016	0.00	0.00	14,945.66	(14,945.66)	NA	-172168800.00%	-112.44%	-112.44%	-112.44%	-112.44%	-112.44%	-104.48%			
311400	2017	4,099.89	0.00	0.00	0.00	0.00%	-364.54%	-419.93%	-89.02%	-89.02%	-89.02%	-89.02%	-89.02%	-82.73%		
311400	2018	0.00	0.00	204.24	(204.24)	NA	-4.98%	-369.52%	-424.92%	-90.06%	-90.06%	-90.06%	-90.06%	-90.06%	-83.76%	
311400	2019	3,800.86	0.00	(0.01)	0.01	0.00%	-5.37%	-2.58%	-191.75%	-220.50%	-75.49%	-75.49%	-75.49%	-75.49%	-75.49%	
311400	2020		0.00	2,818.95	(2,818.95)	NA	-74.17%	-79.54%	-38.26%	-227.43%	-256.18%	-87.49%	-87.49%	-87.49%	-87.49%	
311500	2016	0.00	0.00	4,826.82	(4,826.82)	NA										
311500	2017	57,405.32	0.00	215.92	(215.92)	-0.38%	-8.78%									
311500	2018	0.00	0.00	2,311.53	(2,311.53)	NA	-4.40%	-12.81%								
311500	2019	991.30	0.00	1,734.03	(1,734.03)	-174.92%	-408.11%	-7.30%	-15.56%							
311500	2020	10,697.34	0.00	7,191.46	(7,191.46)	-67.23%	-76.36%	-96.14%	-16.58%	-23.56%						
320100	2004	303,843.23	0.00	0.00	0.00	0.00%										
320100	2005	7,343.99	0.00	1,500.00	(1,500.00)	-20.42%	-0.48%									
320100	2006	783.00	0.00	0.00	0.00	0.00%	-18.46%	-0.48%								
320100	2007	58,950.93	0.00	0.00	0.00	0.00%	0.00%	-2.24%	-0.40%							
320100	2008	1,492,076.55	0.00	22,368.55	(22,368.55)	-1.50%	-1.44%	-1.44%	-1.53%	-1.28%						
320100	2009	42,487.18	0.00	43,773.81	(43,773.81)	-103.03%	-4.31%	-4.15%	-4.15%	-4.22%	-3.55%					
320100	2010	302,856.88	0.00	63,592.77	(63,592.77)	-21.00%	-31.09%	-7.06%	-6.84%	-4.22%	-6.89%	-5.94%				
320100	2011	174,602.49	0.00	26,538.93	(26,538.93)	-15.20%	-18.88%	-25.75%	-7.77%	-7.55%	-7.54%	-7.59%	-6.62%			
320100	2012	61,409.48	0.00	20,982.53	(20,982.53)	-34.17%	-20.14%	-20.62%	-26.64%	-8.55%	-8.31%	-8.31%	-8.35%	-7.31%		
320100	2013	108,505.65	0.00	127,752.33	(127,752.33)	-117.74%	-87.53%	-50.88%	-36.90%	-40.97%	-13.98%	-13.61%	-13.61%	-13.63%	-12.01%	
320100	2014	4,246,456.90	0.00	59,224.15	(59,224.15)	-1.39%	-4.29%	-4.71%	-5.11%	-6.09%	-6.93%	-5.67%	-5.61%	-5.61%	-5.63%	
320100	2015	142,696.81	0.00	263,335.35	(263,335.35)	-184.54%	-7.35%	-10.01%	-10.34%	-10.52%	-11.15%	-11.92%	-9.55%	-9.47%	-9.46%	
320100	2016	305,612.02	0.00	14,511.80	(14,511.80)	-4.75%	-61.98%	-7.18%	-9.68%	-9.99%	-10.17%	-10.78%	-11.51%	-9.34%	-9.26%	
320100	2017	113,269.03	0.00	38,962.54	(38,962.54)	-34.40%	-12.77%	-56.41%	-7.82%	-10.25%	-10.54%	-10.70%	-11.27%	-11.98%	-9.74%	
320100	2018	157,344.69	0.00	52,450.85	(52,450.85)	-33.33%	-33.78%	-18.38%	-51.36%	-8.63%	-10.96%	-11.24%	-11.37%	-11.89%	-12.57%	-9.78%
320100	2019	49,554.90	13,714.28	233,341.72	(219,627.44)	-443.20%	-131.50%	-97.15%	-52.02%	-76.63%	-12.92%	-15.14%	-15.37%	-15.36%	-15.66%	-13.14%
320100	2020	652,230.67	0.00	60,190.15	(60,190.15)	-9.23%	-39.87%	-38.67%	-38.18%	-30.18%	-45.69%	-12.50%	-14.48%	-14.68%	-14.70%	-12.81%
320200	2009	16,458.73	0.00	0.00	0.00	0.00%										
320200	2010	5,721.51	0.00	0.00	0.00	0.00%	0.00%									
320200	2011	63,448.02	0.00	5,508.57	(5,508.57)	-8.68%	-7.96%	-6.43%								
320200	2012	0.00	0.00	0.00	0.00	NA	-8.68%	-7.96%	-6.43%							
320200	2013	0.00	0.00	0.00	0.00	NA	NA	-8.68%	-7.96%	-6.43%						

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Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
320200	2014	265,756.23	0.00	0.00	0.00	0.00%	0.00%	0.00%	-1.67%	-1.64%	-1.57%					
320200	2015	0.00	0.00	50,054.44	(50,054.44)	NA	-18.83%	-18.83%	-18.83%	-16.88%	-16.59%	-15.81%				
320200	2016	117,710.31	0.00	9,410.56	(9,410.56)	-7.99%	-50.52%	-15.51%	-15.51%	-15.51%	-14.54%	-14.35%	-13.85%			
320200	2017	119,291.48	0.00	26,058.70	(26,058.70)	-21.84%	-14.97%	-36.09%	-17.01%	-17.01%	-17.01%	-16.08%	-15.92%	-15.47%		
320200	2018	0.00	0.00	0.00	0.00	NA	-21.84%	-14.97%	-36.09%	-17.01%	-17.01%	-17.01%	-16.08%	-15.92%	-15.47%	
320200	2019	197.73	0.00	0.00	0.00	0.00%	0.00%	-21.81%	-14.95%	-36.06%	-17.00%	-17.00%	-17.00%	-16.07%	-15.91%	
320200	2020	52,195.40	0.00	13,161.56	(13,161.56)	-25.22%	-25.12%	-25.12%	-22.84%	-16.80%	-34.10%	-17.78%	-17.78%	-17.78%	-16.84%	
330000	2004	479,371.87	0.00	182,883.28	(182,883.28)	-38.15%										
330000	2005	79,924.30	0.00	20,324.76	(20,324.76)	-25.43%	-36.33%									
330000	2006	0.00	0.00	5,820.15	(5,820.15)	NA	-32.71%	-37.37%								
330000	2007	3,771.00	0.00	1,481.00	(1,481.00)	-39.27%	-193.61%	-33.01%	-37.39%							
330000	2008	513,362.60	0.00	3,940.00	(3,940.00)	-0.77%	-1.05%	-2.17%	-5.29%	-19.92%						
330000	2009	16,594.80	0.00	1,028.80	(1,028.80)	-6.20%	-0.94%	-1.21%	-2.30%	-5.31%	-19.71%					
330000	2010	81,013.04	0.00	222,941.66	(222,941.66)	-275.19%	-229.46%	-37.30%	-37.32%	-38.26%	-36.79%	-37.34%				
330000	2011	118,144.27	0.00	96,205.00	(96,205.00)	-81.43%	-160.25%	-148.40%	-44.45%	-44.43%	-45.22%	-43.27%	-41.37%			
330000	2012	107,996.65	0.00	0.00	0.00	0.00%	-42.54%	-103.90%	-98.90%	-38.72%	-38.72%	-39.41%	-38.20%	-38.18%		
330000	2013	103,081.50	0.00	2,003.28	(2,003.28)	-1.94%	-0.95%	-29.83%	-78.28%	-75.48%	-34.69%	-34.70%	-35.32%	-34.55%	-35.70%	
330000	2014	2,073,926.76	0.00	16,305.49	(16,305.49)	-0.79%	-0.84%	-0.80%	-4.77%	-13.58%	-13.54%	-11.36%	-11.40%	-11.59%	-11.95%	
330000	2015	633,110.46	0.00	408,901.31	(408,901.31)	-64.59%	-15.71%	-15.20%	-14.64%	-17.24%	-23.94%	-23.85%	-20.60%	-20.62%	-20.78%	
330000	2016	749,896.18	0.00	182,958.72	(182,958.72)	-24.40%	-42.80%	-17.59%	-17.14%	-16.63%	-18.66%	-24.03%	-23.95%	-21.25%	-21.26%	
330000	2017	14,789.99	0.00	67,444.44	(67,444.44)	-456.01%	-32.75%	-47.17%	-19.46%	-18.96%	-18.40%	-20.36%	-25.68%	-25.59%	-22.71%	
330000	2018	263,359.62	0.00	184,014.14	(184,014.14)	-69.87%	-90.40%	-42.26%	-50.77%	-23.01%	-22.45%	-21.83%	-23.57%	-28.48%	-28.40%	-26.65%
330000	2019	77,251.98	0.00	392,191.21	(392,191.21)	-507.68%	-169.17%	-181.10%	-74.79%	-71.07%	-32.84%	-32.02%	-31.16%	-32.60%	-37.25%	-33.20%
330000	2020	98,372.45	0.00	359,277.96	(359,277.96)	-365.22%	-427.88%	-213.10%	-221.02%	-98.52%	-86.83%	-41.20%	-40.19%	-39.14%	-40.31%	-40.05%
330100	2014	10,399.65	0.00	2,406.37	(2,406.37)	-23.14%										
330100	2015	0.00	0.00	149.96	(149.96)	NA	-24.58%									
330100	2016	0.00	0.00	0.00	0.00	NA	NA	-24.58%								
330100	2017	0.00	0.00	0.00	0.00	NA	NA	NA	-24.58%							
330100	2018	0.00	0.00	0.00	0.00	NA	NA	NA	NA	-24.58%						
330100	2019	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	-24.58%					
330100	2020	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	-24.58%				
330200	2009	0.00	0.00	5,100.00	(5,100.00)	NA										
330200	2010	1,000.00	0.00	1,511.33	(1,511.33)	-151.13%	-661.13%									
330200	2011	0.00	0.00	64,910.06	(64,910.06)	NA	-6642.14%	-7152.14%								
330200	2012	0.00	0.00	0.00	0.00	NA	NA	-6642.14%	-7152.14%							
330200	2013	0.00	0.00	11,100.00	(11,100.00)	NA	NA	NA	-7752.14%	-8262.14%						
330200	2014	6,278.05	0.00	0.00	0.00	0.00%	-176.81%	-176.81%	-1210.73%	-1065.14%	-1135.21%					
330200	2015	5,773.91	0.00	62,343.33	(62,343.33)	-1079.74%	-517.29%	-609.39%	-609.39%	-1147.97%	-1071.60%	-1110.67%				
330200	2016	0.00	0.00	5,753.88	(5,753.88)	NA	-1179.40%	-565.03%	-657.13%	-657.13%	-1195.72%	-1115.68%	-1154.76%			
330200	2017	124,263.11	0.00	83,039.20	(83,039.20)	-66.83%	-71.46%	-116.23%	-110.87%	-119.02%	-119.02%	-166.63%	-166.52%	-170.23%		
330200	2018	216,064.67	0.00	102,858.31	(102,858.31)	-47.61%	-54.62%	-56.31%	-73.39%	-72.08%	-75.23%	-75.23%	-93.65%	-93.81%	-95.26%	
330200	2019	15,432.76	0.00	192,673.84	(192,673.84)	-1248.47%	-127.66%	-106.41%	-108.03%	-123.55%	-121.44%	-124.46%	-124.46%	-142.10%	-142.13%	
330200	2020	83,013.94	0.00	46,380.02	(46,380.02)	-55.87%	-242.83%	-108.71%	-96.85%	-98.16%	-110.91%	-109.37%	-111.83%	-111.83%	-126.23%	
331 Combin	2004	428,784.41	210.19	196,382.12	(196,171.93)	-45.75%										
331 Combin	2005	48,948.20	12,275.50	54,799.73	(42,524.23)	-86.88%	-49.96%									
331 Combin	2006	122,214.25	8,416.00	229,932.06	(221,516.06)	-181.25%	-154.26%	-76.71%								
331 Combin	2007	44,812.69	5,500.00	70,025.20	(64,525.20)	-143.99%	-171.25%	-152.13%	-81.38%							
331 Combin	2008	3,128,463.44	28.32	19,051.64	(19,023.32)	-0.61%	-2.63%	-9.26%	-10.39%	-14.41%						
331 Combin	2009	132,287.12	0.66	82,636.85	(82,636.19)	-62.47%	-3.12%	-5.03%	-11.31%	-12.37%	-16.04%					
331 Combin	2010	690,808.76	8,297.41	136,585.86	(128,288.45)	-18.57%	-25.63%	-5.82%	-7.37%	-12.53%	-13.40%	-16.42%				
331 Combin	2011	308,751.78	0.03	670,958.27	(670,958.24)	-217.31%	-79.96%	-77.92%	-21.15%	-22.43%	-26.81%	-27.47%	-29.06%			
331 Combin	2012	417,055.39	0.00	295,624.87	(295,624.87)	-70.88%	-133.17%	-77.29%	-76.02%	-25.58%	-26.70%	-30.60%	-31.17%	-32.34%		
331 Combin	2013	186,467.29	0.00	131,955.05	(131,955.05)	-70.77%	-70.85%	-120.42%	-76.53%	-75.46%	-27.31%	-28.38%	-32.09%	-32.62%	-33.64%	

CALIFORNIA AMERICAN WATER
Water Operations
Net Salvage Analysis

Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
331 Combin	2014	231,155.03	0.00	657,301.33	(657,301.33)	-284.36%	-188.99%	-129.98%	-153.56%	-102.72%	-100.01%	-38.98%	-39.89%	-43.17%	-43.58%	
331 Combin	2015	192,073.94	0.00	1,800,608.70	(1,800,608.70)	-937.46%	-580.75%	-424.78%	-281.03%	-266.30%	-181.84%	-174.53%	-71.62%	-72.22%	-74.67%	
331 Combin	2016	191,482.07	2,233.64	369,351.86	(367,118.22)	-191.72%	-565.17%	-459.57%	-369.08%	-266.99%	-256.95%	-182.70%	-175.93%	-75.81%	-76.37%	
331 Combin	2017	169,378.86	0.00	395,409.36	(395,409.36)	-233.45%	-211.31%	-463.55%	-410.72%	-345.41%	-262.90%	-254.60%	-186.30%	-179.80%	-80.54%	
331 Combin	2018	259,497.14	253.40	655,589.15	(655,335.75)	-252.54%	-245.00%	-228.56%	-396.15%	-371.39%	-325.82%	-261.27%	-254.33%	-192.79%	-186.59%	-87.44%
331 Combin	2019	126,138.02	1,464.00	1,201,115.21	(1,199,651.21)	-951.06%	-481.02%	-405.47%	-360.64%	-470.73%	-433.90%	-383.97%	-310.33%	-296.54%	-227.29%	-107.73%
331 Combin	2020	(17,667.39)	1,459.08	932,052.44	(930,593.36)	5267.29%	-1963.89%	-757.02%	-591.98%	-486.82%	-580.81%	-521.33%	-458.56%	-366.47%	-344.16%	-123.25%
333000	2004	573,490.09	2,175.79	19,082.29	(16,906.50)	-2.95%										
333000	2005	45,399.24	5,788.58	23,181.45	(17,392.87)	-38.31%	-5.54%									
333000	2006	37,517.85	1,038.26	136,430.02	(135,391.76)	-360.87%	-184.26%	-25.85%								
333000	2007	37,007.59	0.00	10,398.10	(10,398.10)	-28.10%	-195.62%	-136.07%	-25.97%							
333000	2008	542,254.39	3,224.56	70,690.09	(67,465.53)	-12.44%	-13.44%	-34.58%	-34.83%	-20.03%						
333000	2009	96,056.13	2,260.04	421,898.67	(419,638.63)	-436.87%	-76.31%	-73.67%	-88.79%	-85.76%	-50.10%					
333000	2010	176,067.60	2,228.90	490,564.38	(488,335.48)	-277.36%	-333.66%	-119.78%	-307.72%	-126.14%	-121.87%	-76.64%				
333000	2011	239,319.09	8,057.57	718,857.56	(710,799.99)	-297.01%	-288.68%	-316.51%	-160.03%	-155.55%	-162.38%	-157.58%	-106.82%			
333000	2012	195,276.17	23,928.74	1,089,517.83	(1,065,589.09)	-545.68%	-408.75%	-370.86%	-379.83%	-220.33%	-214.80%	-218.94%	-212.95%	-150.94%		
333000	2013	409,373.15	33,196.61	907,361.20	(874,164.59)	-213.54%	-320.81%	-314.06%	-307.72%	-318.84%	-218.65%	-214.49%	-217.66%	-213.08%	-161.84%	
333000	2014	386,488.64	32,894.58	1,160,439.06	(1,127,544.48)	-291.74%	-251.51%	-309.47%	-307.05%	-303.33%	-311.87%	-232.47%	-228.83%	-231.17%	-227.13%	
333000	2015	165,006.88	5,179.07	1,309,454.63	(1,304,275.56)	-790.44%	-440.95%	-344.06%	-378.12%	-364.21%	-354.48%	-359.22%	-274.13%	-270.08%	-271.57%	
333000	2016	556,587.52	6,772.36	1,390,515.19	(1,383,742.83)	-248.61%	-372.51%	-344.34%	-309.05%	-336.03%	-331.25%	-326.79%	-331.54%	-268.99%	-265.81%	
333000	2017	375,371.33	6,574.71	1,213,444.82	(1,206,870.11)	-321.51%	-277.98%	-355.06%	-338.56%	-311.52%	-333.42%	-329.68%	-326.00%	-330.09%	-275.27%	
333000	2018	532,899.71	20,424.12	816,158.90	(795,734.78)	-149.32%	-220.49%	-231.17%	-287.79%	-288.55%	-275.89%	-295.99%	-296.08%	-294.99%	-299.34%	-220.33%
333000	2019	447,460.01	3,762.30	947,983.20	(944,220.90)	-211.02%	-177.48%	-217.36%	-226.46%	-271.25%	-274.47%	-265.79%	-283.60%	-284.57%	-284.21%	-248.74%
333000	2020	529,219.72	6,954.62	1,043,127.44	(1,036,172.82)	-195.79%	-202.77%	-183.90%	-211.31%	-219.81%	-255.93%	-260.56%	-254.90%	-270.68%	-272.32%	-244.83%
334000	2004	971,479.17	2,315.60	1,491.48	824.12	0.08%										
334000	2005	39,836.12	10,290.69	3,609.70	6,680.99	16.77%	0.74%									
334100	2006	28,424.16	15,169.64	(11,399.72)	26,569.36	93.47%	48.71%	3.28%								
334100	2007	80,934.88	10,483.65	3,698.77	6,784.88	8.38%	30.50%	26.83%	3.65%							
334100	2008	419,082.94	24,705.88	16,948.52	7,757.36	1.85%	2.91%	7.78%	8.41%	3.16%						
334100	2009	218,955.43	60,674.70	108,685.85	(48,011.15)	-21.93%	-6.31%	-4.66%	-0.92%	-0.03%	0.03%					
334100	2010	538,496.92	48,163.94	125,760.75	(77,596.81)	-14.41%	-16.58%	-10.02%	-8.83%	-6.57%	-5.87%	-3.35%				
334100	2011	523,851.08	32,271.68	485,135.77	(452,864.09)	-86.45%	-49.93%	-45.15%	-33.56%	-31.66%	-29.69%	-28.69%	-18.78%			
334100	2012	287,985.32	57,284.56	256,344.50	(199,059.94)	-69.12%	-80.30%	-54.03%	-49.55%	-38.71%	-36.87%	-35.11%	-34.14%	-23.44%		
334100	2013	178,398.47	45,321.92	363,945.28	(318,623.36)	-178.60%	-111.00%	-98.01%	-68.56%	-62.72%	-50.23%	-48.12%	-46.35%	-45.27%	-31.86%	
334100	2014	224,183.91	41,021.46	206,381.58	(165,360.12)	-73.76%	-120.22%	-98.91%	-93.54%	-69.23%	-63.98%	-52.44%	-50.45%	-48.81%	-47.78%	
334100	2015	136,344.51	46,372.05	(72,450.85)	118,822.90	87.15%	-12.91%	-67.76%	-68.23%	-75.30%	-57.94%	-54.20%	-44.91%	-43.25%	-41.78%	
334100	2016	303,788.04	802.40	316,541.73	(315,739.33)	-103.93%	-44.74%	-54.53%	-80.80%	-77.82%	-80.56%	-64.31%	-60.47%	-51.24%	-49.58%	
334100	2017	534,850.30	39,500.14	375,519.75	(336,019.61)	-62.82%	-77.72%	-54.66%	-58.23%	-73.82%	-73.01%	-76.22%	-64.02%	-60.89%	-53.08%	
334100	2018	1,783,095.96	41,416.44	215,686.80	(174,270.36)	-9.77%	-22.01%	-31.51%	-25.64%	-29.26%	-37.69%	-40.31%	-46.40%	-42.58%	-41.62%	-30.63%
334100	2019	502,015.11	789,426.88	958,387.10	(168,960.22)	-33.66%	-15.02%	-24.09%	-31.85%	-26.88%	-29.89%	-37.14%	-39.47%	-44.97%	-41.68%	-36.03%
334100	2020	400,905.00	49,409.06	272,240.09	(222,831.03)	-55.58%	-43.39%	-21.07%	-28.01%	-34.55%	-30.02%	-32.54%	-38.96%	-40.95%	-45.84%	-37.64%
334102	2015	0.00	0.00	0.00	0.00	NA										
334102	2016	0.00	0.00	0.00	0.00	NA	NA									
334102	2017	0.00	0.00	0.00	0.00	NA	NA	NA								
334102	2018	0.00	0.00	0.00	0.00	NA	NA	NA	NA							
334102	2019	0.00	0.00	108.08	(108.08)	NA	NA	NA	NA	NA						
334102	2020	0.00	0.00	7,726.36	(7,726.36)	NA	NA	NA	NA	NA	NA					
334200	2009	0.00	1,335.52	11,725.43	(1,416.01)	-1.12%										
334200	2010	0.00	0.00	0.00	0.00	0.00%	-1.11%									
334200	2011	1,424.93	0.00	0.00	(14,137.45)	-189.00%	-159.88%	-11.48%								
334200	2012	0.00	60.64	158.15	(28,201.06)	-107.05%	-125.18%	-120.33%	-27.04%							
334200	2013	0.00	0.00	208.97	(3,810.19)	-2.23%	-16.24%	-22.56%	-22.41%	-14.30%						

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Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
334200	2014	9,948.59	0.00	13,072.35	(50,425.22)	-45.38%	-19.24%	-26.75%	-30.59%	-30.46%	-22.09%					
334200	2015	0.00	2,330.46	18,532.03	(66,104.65)	-71.89%	-57.39%	-32.19%	-37.12%	-39.91%	-39.77%	-30.64%				
334200	2016	0.00	0.00	11,662.46	(110,076.37)	-77.78%	-75.46%	-65.76%	-44.71%	-47.74%	-49.67%	-49.55%	-40.49%			
334200	2017	0.00	0.00	0.00	(53,463.67)	-117.71%	-87.48%	-82.34%	-71.81%	-50.62%	-53.16%	-54.87%	-54.74%	-45.34%		
334200	2018	460.39	0.00	0.00	(56,924.76)	-69.61%	-86.78%	-82.04%	-79.45%	-71.43%	-53.04%	-55.17%	-56.65%	-56.53%	-47.81%	
334200	2019	0.00	0.00	0.00	(121,816.06)	-158.17%	-112.56%	-113.71%	-99.00%	-93.31%	-83.60%	-64.29%	-65.80%	-67.03%	-66.91%	
334200	2020	0.00	0.00	0.00	(89,246.91)	-1062.68%	-247.11%	-160.29%	-151.19%	-121.86%	-111.56%	-98.36%	-75.81%	-76.90%	-78.00%	
334300	2014	0.00	0.00	62.85	(62.85)	NA										
334300	2015	0.00	0.00	0.00	0.00	NA	NA									
334300	2016	0.00	0.00	12,068.18	(12,068.18)	NA	NA	NA								
334300	2017	0.00	0.00	0.00	0.00	NA	NA	NA	NA							
334300	2018	16,427.43	0.00	13,816.06	(13,816.06)	-84.10%	-84.10%	-157.57%	-157.57%	-157.95%						
334300	2019	0.00	0.00	0.00	0.00	NA	-84.10%	-84.10%	-157.57%	-157.57%	-157.95%					
334300	2020	0.00	0.00	0.00	0.00	NA	NA	-84.10%	-84.10%	-157.57%	-157.57%	-157.95%				
335000	2004	126,629.44	0.00	1,416.01	(1,416.01)	-1.12%										
335000	2005	1,362.38	0.00	0.00	0.00	0.00%	-1.11%									
335000	2006	7,480.09	0.00	14,137.45	(14,137.45)	-189.00%	-159.88%	-11.48%								
335000	2007	26,343.03	0.00	28,201.06	(28,201.06)	-107.05%	-125.18%	-120.33%	-27.04%							
335000	2008	170,748.04	0.00	3,810.19	(3,810.19)	-2.23%	-16.24%	-22.56%	-22.41%	-14.30%						
335000	2009	111,111.66	0.00	50,425.22	(50,425.22)	-45.38%	-19.24%	-26.75%	-30.59%	-30.46%	-22.09%					
335000	2010	91,952.98	6,224.16	72,328.81	(66,104.65)	-71.89%	-57.39%	-32.19%	-37.12%	-39.91%	-39.77%	-30.64%				
335000	2011	141,518.06	0.00	110,076.37	(110,076.37)	-77.78%	-75.46%	-65.76%	-44.71%	-47.74%	-49.67%	-49.55%	-40.49%			
335000	2012	45,421.10	0.00	53,463.67	(53,463.67)	-117.71%	-87.48%	-82.34%	-71.81%	-50.62%	-53.16%	-54.87%	-54.74%	-45.34%		
335000	2013	81,777.22	0.00	56,924.76	(56,924.76)	-69.61%	-86.78%	-82.04%	-79.45%	-71.43%	-53.04%	-55.17%	-56.65%	-56.53%	-47.81%	
335000	2014	77,015.40	0.00	121,816.06	(121,816.06)	-158.17%	-112.56%	-113.71%	-99.00%	-93.31%	-83.60%	-64.29%	-65.80%	-67.03%	-66.91%	
335000	2015	8,398.29	0.00	89,246.91	(89,246.91)	-1062.68%	-247.11%	-160.29%	-151.19%	-121.86%	-111.56%	-98.36%	-75.81%	-76.90%	-78.00%	
335000	2016	116,847.10	1,692.74	135,614.89	(133,922.15)	-114.61%	-178.19%	-170.56%	-141.50%	-138.22%	-120.06%	-112.19%	-101.18%	-81.18%	-81.96%	
335000	2017	42,004.00	0.00	225,321.47	(225,321.47)	-536.43%	-226.15%	-268.16%	-233.48%	-192.38%	-183.25%	-154.15%	-141.65%	-126.71%	-102.74%	
335000	2018	100,273.32	1,307.13	68,995.50	(67,688.37)	-67.50%	-205.94%	-164.76%	-192.95%	-185.17%	-163.01%	-158.64%	-139.98%	-131.11%	-119.44%	-89.00%
335000	2019	443,442.75	0.00	173,059.07	(173,059.07)	-39.03%	-44.28%	-79.57%	-85.40%	-96.94%	-102.93%	-99.80%	-100.68%	-97.62%	-95.56%	-81.48%
335000	2020	195,122.17	0.00	172,973.44	(172,973.44)	-88.65%	-54.19%	-56.00%	-81.84%	-86.11%	-95.16%	-100.09%	-97.75%	-98.57%	-96.22%	-82.39%
339100	2014	583,436.23	0.00	0.00	0.00	0.00%										
339100	2015	0.00	0.00	0.00	0.00	NA	0.00%									
339100	2016	0.00	0.00	0.00	0.00	NA	NA	0.00%								
339100	2017	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%							
339100	2018	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%						
339100	2019	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%					
339100	2020	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	0.00%				
339200	2014	86,842.72	0.00	0.00	0.00	0.00%										
339200	2015	0.00	0.00	0.00	0.00	NA	0.00%									
339200	2016	0.00	0.00	0.00	0.00	NA	NA	0.00%								
339200	2017	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%							
339200	2018	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%						
339200	2019	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%					
339200	2020	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	0.00%				
339500	2014	1,474.99	0.00	0.00	0.00	0.00%										
339500	2015	0.00	0.00	0.00	0.00	NA	0.00%									
339500	2016	0.00	0.00	0.00	0.00	NA	NA	0.00%								
339500	2017	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%							
339500	2018	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%						
339500	2019	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%					

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339500	2020	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	0.00%				
339600	2009	0.00	0.00	71.78	(71.78)	NA										
339600	2010	0.00	0.00	0.00	0.00	NA	NA									
339600	2011	0.00	0.00	0.00	0.00	NA	NA	NA								
339600	2012	0.00	0.00	0.00	0.00	NA	NA	NA	NA							
339600	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA						
339600	2014	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA					
339600	2015	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA				
339600	2016	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA			
339600	2017	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA		
339600	2018	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
339600	2019	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
339600	2020	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
340100	2004	21,472.58	0.00	0.00	0.00	0.00%										
340100	2005	0.00	0.00	0.00	0.00	NA	0.00%									
340100	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
340100	2007	137,749.75	540.95	0.00	540.95	0.39%	0.39%	0.39%	0.34%							
340100	2008	29,366.12	0.00	750.17	(750.17)	-2.55%	-0.13%	-0.13%	-0.13%	-0.11%						
340100	2009	20,256.48	0.00	0.00	0.00	0.00%	-1.51%	-0.11%	-0.11%	-0.11%	-0.10%					
340100	2010	19,946.48	0.00	63.44	(63.44)	-0.32%	-0.16%	-1.17%	-0.13%	-0.13%	-0.13%	-0.12%				
340100	2011	25,457.90	0.00	0.00	0.00	0.00%	-0.14%	-0.10%	-0.86%	-0.12%	-0.12%	-0.12%	-0.11%			
340100	2012	12,367.17	0.00	0.00	0.00	0.00%	0.00%	-0.11%	-0.08%	-0.76%	-0.11%	-0.11%	-0.11%	-0.10%		
340100	2013	34,534.57	0.00	35,161.36	(35,161.36)	-101.81%	-74.97%	-48.59%	-38.16%	-31.29%	-25.35%	-12.67%	-12.67%	-12.67%	-11.77%	
340100	2014	390,803.53	0.00	148.77	(148.77)	-0.04%	-8.30%	-8.07%	-7.62%	-7.32%	-7.03%	-6.78%	-5.31%	-5.31%	-5.31%	
340100	2015	83,462.74	0.00	0.00	0.00	0.00%	-0.03%	-6.94%	-6.78%	-6.46%	-6.24%	-6.03%	-5.86%	-4.72%	-4.72%	
340100	2016	13,606.98	0.00	0.00	0.00	0.00%	0.00%	-0.03%	-6.76%	-6.60%	-6.30%	-6.10%	-5.89%	-5.74%	-4.64%	
340100	2017	163,750.75	0.00	2,238.03	(2,238.03)	-1.37%	-1.26%	-0.86%	-0.37%	-5.47%	-5.38%	-5.19%	-5.06%	-4.92%	-4.83%	
340100	2018	119,662.43	0.00	6,367.45	(6,367.45)	-5.32%	-3.04%	-2.90%	-2.26%	-1.14%	-5.45%	-5.37%	-5.21%	-5.09%	-4.98%	-4.12%
340100	2019	3,830.46	0.00	4,929.01	(4,929.01)	-128.68%	-9.15%	-4.71%	-4.50%	-3.52%	-1.77%	-6.03%	-5.94%	-5.76%	-5.64%	-4.66%
340100	2020	15,875.15	0.00	1,185.60	(1,185.60)	-7.47%	-31.03%	-8.96%	-4.86%	-4.65%	-3.68%	-1.88%	-6.06%	-5.97%	-5.79%	-4.70%
340200	2004	189,553.28	0.00	0.00	0.00	0.00%										
340200	2005	0.00	0.00	0.00	0.00	NA	0.00%									
340200	2006	4,575.53	0.00	0.00	0.00	0.00%	0.00%	0.00%								
340200	2007	733,679.17	0.00	4,242.96	(4,242.96)	-0.58%	-0.57%	-0.57%	-0.46%							
340200	2008	116,872.50	0.00	0.00	0.00	0.00%	-0.50%	-0.50%	-0.50%	-0.41%						
340200	2009	174,813.00	214.12	843.17	(629.05)	-0.36%	-0.22%	-0.48%	-0.47%	-0.47%	-0.40%					
340200	2010	132,944.33	302.11	1,458.11	(1,156.00)	-0.87%	-0.58%	-0.42%	-0.52%	-0.52%	-0.52%	-0.45%				
340200	2011	140,304.29	0.00	633.12	(633.12)	-0.45%	-0.65%	-0.54%	-0.43%	-0.51%	-0.51%	-0.51%	-0.45%			
340200	2012	98,823.13	3,439.57	958.79	2,480.78	2.51%	0.77%	0.19%	0.01%	0.01%	-0.30%	-0.30%	-0.30%	-0.26%		
340200	2013	131,808.86	0.00	4,926.88	(4,926.88)	-3.74%	-1.06%	-0.83%	-0.84%	-0.72%	-0.61%	-0.60%	-0.59%	-0.59%	-0.53%	
340200	2014	1,639,581.77	0.00	876.97	(876.97)	-0.05%	-0.33%	-0.18%	-0.20%	-0.24%	-0.25%	-0.24%	-0.32%	-0.31%	-0.31%	
340200	2015	23,766.72	51.20	465.66	(414.46)	-1.74%	-0.08%	-0.35%	-0.20%	-0.21%	-0.26%	-0.26%	-0.25%	-0.33%	-0.33%	
340200	2016	16,881.61	411.12	28,695.49	(28,284.37)	-167.55%	-70.60%	-1.76%	-1.90%	-1.68%	-1.59%	-1.55%	-1.46%	-1.39%	-1.21%	
340200	2017	155,620.28	0.00	0.00	0.00	0.00%	-16.40%	-14.62%	-1.61%	-1.75%	-1.55%	-1.48%	-1.45%	-1.37%	-1.31%	
340200	2018	980,923.67	0.00	213.12	(213.12)	-0.02%	-0.02%	-2.47%	-2.46%	-1.06%	-1.18%	-1.06%	-1.03%	-1.02%	-0.99%	-0.86%
340200	2019	183,538.75	0.00	1,106.19	(1,106.19)	-0.60%	-0.11%	-0.10%	-2.21%	-2.21%	-1.03%	-1.14%	-1.03%	-1.01%	-1.00%	-0.88%
340200	2020	28,447.46	0.00	0.00	0.00	0.00%	-0.52%	-0.11%	-0.10%	-2.17%	-2.16%	-1.02%	-1.13%	-1.02%	-1.00%	-0.88%
340300	2004	176,094.17	0.00	0.00	0.00	0.00%										
340300	2005	0.00	0.00	0.00	0.00	NA	0.00%									
340300	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
340300	2007	8,312.92	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
340300	2008	3,641.60	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
340300	2009	11,644.12	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					

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340300	2010	7,109.05	672.06	517.65	154.41	2.17%	0.82%	0.69%	0.50%	0.50%	0.50%	0.07%				
340300	2011	86.27	0.00	0.00	0.00	0.00%	2.15%	0.82%	0.69%	0.50%	0.50%	0.50%	0.07%			
340300	2012	502,448.11	0.00	0.00	0.00	0.00%	0.00%	0.03%	0.03%	0.03%	0.03%	0.03%	0.03%	0.02%		
340300	2013	4,001,142.44	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
340300	2014	1,298,342.90	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
340300	2015	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
340300	2016	0.01	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
340300	2017	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
340300	2018	4,681.90	0.00	1,418.25	(1,418.25)	-30.29%	-30.29%	-30.29%	-30.29%	-0.11%	-0.03%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%
340300	2019	0.00	0.00		0.00	NA	-30.29%	-30.29%	-30.29%	-30.29%	-0.11%	-0.03%	-0.02%	-0.02%	-0.02%	-0.02%
340300	2020	540,136.59	0.00	0.00	0.00	0.00%	0.00%	-0.26%	-0.26%	-0.26%	-0.26%	-0.08%	-0.02%	-0.02%	-0.02%	-0.02%
340310	2018	2,350,182.55	0.00	0.00	0.00	0.00%										
340310	2019	0.00	0.00	0.00	0.00	NA	0.00%									
340310	2020	0.00	0.00	0.00	0.00	NA	NA	0.00%								
340500	2004	9,422.75	0.00	0.00	0.00	0.00%										
340500	2005	0.00	0.00	0.00	0.00	NA	0.00%									
340500	2006	264.13	0.00	0.00	0.00	0.00%	0.00%	0.00%								
340500	2007	36,543.36	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
340500	2008	26,022.69	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
340500	2009	8,369.66	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
340500	2010	1,295.34	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
340500	2011	2,359.19	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
340500	2012	20,791.62	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
340500	2013	51,043.01	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
340500	2014	54,253.54	0.00	106.57	(106.57)	-0.20%	-0.10%	-0.08%	-0.08%	-0.08%	-0.08%	-0.06%	-0.05%	-0.05%	-0.05%	
340500	2015	531.79	0.00	0.00	0.00	0.00%	-0.19%	-0.10%	-0.08%	-0.08%	-0.08%	-0.08%	-0.06%	-0.05%	-0.05%	
340500	2016	0.00	0.00	0.00	0.00	NA	0.00%	-0.19%	-0.10%	-0.08%	-0.08%	-0.08%	-0.08%	-0.06%	-0.05%	
340500	2017	537.66	0.00	0.00	0.00	0.00%	0.00%	0.00%	-0.19%	-0.10%	-0.08%	-0.08%	-0.08%	-0.08%	-0.06%	
340500	2018	1,023.63	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	-0.19%	-0.10%	-0.08%	-0.08%	-0.08%	-0.08%	-0.05%
340500	2019	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	-0.19%	-0.10%	-0.08%	-0.08%	-0.08%	-0.05%
340500	2020	21,082.09	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.14%	-0.08%	-0.07%	-0.07%	-0.05%
341000	2004	330,426.49	3,050.00	0.00	3,050.00	0.92%										
341000	2005	70,449.18	500.00	0.00	500.00	0.71%	0.89%									
341100	2006	365,383.51	9,353.50	0.00	9,353.50	2.56%	2.26%	1.68%								
341100	2007	16,635.63	20,816.74	1,150.00	19,666.74	118.22%	7.60%	6.52%	4.16%							
341100	2008	324,249.73	18,840.64	0.00	18,840.64	5.81%	11.30%	6.78%	6.23%	4.64%						
341100	2009	14,567.87	0.00	0.00	0.00	0.00%	5.56%	10.83%	6.64%	6.11%	4.58%					
341100	2010	240,034.40	22,031.76	0.00	22,031.76	9.18%	8.65%	7.06%	10.17%	7.27%	6.83%	5.39%				
341100	2011	36,632.16	300.00	0.00	300.00	0.82%	8.07%	7.67%	6.69%	9.62%	7.04%	6.62%	5.27%			
341100	2012	0.00	0.00	0.00	0.00	NA	0.82%	8.07%	7.67%	6.69%	9.62%	7.04%	6.62%	5.27%		
341100	2013	33,285.63	0.00	0.00	0.00	0.00%	0.00%	0.43%	7.20%	6.88%	6.35%	9.14%	6.81%	6.42%	5.15%	
341100	2014	511,724.95	7,487.32	0.00	7,487.32	1.46%	1.37%	1.37%	1.34%	3.63%	3.57%	4.19%	5.80%	5.04%	4.85%	
341100	2015	0.00	0.00	0.00	0.00	NA	1.46%	1.37%	1.37%	1.34%	3.63%	3.57%	4.19%	5.80%	5.04%	
341100	2016	50,809.86	3,660.00	0.00	3,660.00	7.20%	7.20%	1.98%	1.87%	1.87%	1.81%	3.84%	3.77%	4.32%	5.86%	
341100	2017	865.31	0.00	0.00	0.00	0.00%	7.08%	7.08%	1.98%	1.87%	1.87%	1.81%	3.83%	3.77%	4.32%	
341100	2018	53,837.52	132.19	0.00	132.19	0.25%	0.24%	3.59%	3.59%	1.83%	1.73%	1.73%	1.69%	3.63%	3.57%	4.15%
341100	2019	0.00	0.00	0.00	0.00	NA	0.25%	0.24%	3.59%	3.59%	1.83%	1.73%	1.73%	1.69%	3.63%	4.77%
341100	2020	0.00	0.00	0.00	0.00	NA	NA	0.25%	0.24%	3.59%	3.59%	1.83%	1.73%	1.73%	1.69%	4.94%
341200	2004	202,331.08	0.00	0.00	0.00	0.00%										
341200	2005	44,938.18	0.00	0.00	0.00	0.00%	0.00%									
341200	2006	221,487.90	1,867.50	(5,600.00)	7,467.50	3.37%	2.80%	1.59%								
341200	2007	38,528.46	3,183.00	0.00	3,183.00	8.26%	4.10%	3.49%	2.10%							
341200	2008	190,833.08	13,417.36	0.00	13,417.36	7.03%	7.24%	5.34%	4.85%	3.45%						

	Activity		Gross	Cost of	Net	Net	2- yr	3- yr	4- yr	5- yr	6- yr	7- yr	8- yr	9- yr	10- yr	15- yr
Account	Year	Retirement	Salvage	Removal	Salvage	Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %
341200	2009	276,210.08	7,550.00	5,600.00	1,950.00	0.71%		3.29%	3.67%	3.58%	3.37%	2.67%				
341200	2010	351,334.34	30,412.24	547.74	29,864.50	8.50%		5.07%	5.53%	5.65%	5.18%	4.97%	4.22%			
341200	2011	130,136.58	4,900.00	0.00	4,900.00	3.77%		7.22%	4.85%	5.29%	5.40%	5.03%	4.85%	4.18%		
341200	2012		0.00	0.00	0.00	NA		3.77%	7.22%	4.85%	5.29%	5.40%	5.03%	4.85%	4.18%	
341200	2013	91,338.10	0.00	0.00	0.00	0.00%		0.00%	2.21%	6.07%	4.32%	4.82%	4.94%	4.68%	4.52%	3.93%
341200	2014	792,166.24	21,848.87	0.00	21,848.87	2.76%		2.47%	2.64%	2.64%	4.15%	3.57%	3.93%	4.02%	3.95%	3.87%
341200	2015	0.00	0.00	0.00	0.00	NA		2.76%	2.47%	2.47%	2.64%	4.15%	3.57%	3.93%	4.02%	3.95%
341200	2016	0.00	15,900.00	0.00	15,900.00	NA		NA	4.77%	4.27%	4.21%	5.31%	4.54%	4.80%	4.87%	
341200	2017	0.00	0.00	0.00	0.00	NA		NA	NA	4.77%	4.27%	4.27%	4.21%	5.31%	4.54%	4.80%
341200	2018	0.00	0.00	0.00	0.00	NA		NA	NA	4.77%	4.27%	4.27%	4.21%	5.31%	4.54%	4.21%
341200	2019	0.00	0.00	0.00	0.00	NA		NA	NA	NA	4.77%	4.27%	4.27%	4.21%	5.31%	4.61%
341200	2020	0.00	0.00	0.00	0.00	NA		NA	NA	NA	NA	4.77%	4.27%	4.27%	4.21%	4.71%
341300	2004	127,258.92	0.00		0.00	0.00%										
341300	2005	30,015.30	0.00		0.00	0.00%		0.00%								
341300	2006	76,778.04	3,390.00	(440.00)	3,830.00	4.99%		3.59%	1.64%							
341300	2007	0.00	0.00	0.00	0.00	NA		4.99%	3.59%	1.64%						
341300	2008	0.00	0.00	0.00	0.00	NA		NA	4.99%	3.59%	1.64%					
341300	2009	0.00	440.00	440.00	0.00	NA		NA	NA	4.99%	3.59%	1.64%				
341300	2010	17,450.09	550.00	0.00	550.00	3.15%		3.15%	3.15%	4.65%	3.53%	1.74%				
341300	2011	17,894.49	1,900.00	0.00	1,900.00	10.62%		6.93%	6.93%	6.93%	6.93%	5.60%	4.42%	2.33%		
341300	2012	0.00	0.00	0.00	0.00	NA		10.62%	6.93%	6.93%	6.93%	5.60%	4.42%	2.33%		
341300	2013	0.00	0.00	0.00	0.00	NA		NA	10.62%	6.93%	6.93%	5.60%	4.42%	2.33%	2.33%	
341300	2014	57,440.42	0.00	0.00	0.00	0.00%		0.00%	0.00%	2.52%	2.64%	2.64%	2.64%	3.70%	3.15%	
341300	2015	0.00	0.00	0.00	0.00	NA		0.00%	0.00%	0.00%	2.52%	2.64%	2.64%	2.64%	3.70%	
341300	2016	0.00	0.00	0.00	0.00	NA		NA	0.00%	0.00%	2.52%	2.64%	2.64%	2.64%	2.64%	
341300	2017	0.00	0.00	0.00	0.00	NA		NA	NA	0.00%	0.00%	2.52%	2.64%	2.64%	2.64%	
341300	2018	0.00	0.00	0.00	0.00	NA		NA	NA	0.00%	0.00%	0.00%	2.52%	2.64%	2.64%	1.92%
341300	2019	0.00	0.00	0.00	0.00	NA		NA	NA	NA	0.00%	0.00%	0.00%	2.52%	2.64%	3.15%
341300	2020		0.00	0.00	0.00	NA		NA	NA	NA	NA	0.00%	0.00%	0.00%	2.52%	3.70%
341400	2008	9,678.30	790.00	0.00	790.00	8.16%										
341400	2009	0.00	0.00	0.00	0.00	NA		8.16%								
341400	2010	0.00	0.00	0.00	0.00	NA		NA	8.16%							
341400	2011	0.00	0.00	0.00	0.00	NA		NA	NA	8.16%						
341400	2012	0.00	0.00	0.00	0.00	NA		NA	NA	NA	8.16%					
341400	2013	0.00	0.00	0.00	0.00	NA		NA	NA	NA	NA	8.16%				
341400	2014	35,666.53	0.00	0.00	0.00	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	1.74%			
341400	2015	0.00	0.00	0.00	0.00	NA		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.74%		
341400	2016	0.00	0.00	0.00	0.00	NA		NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.74%	
341400	2017	38,161.38	0.00	4,256.93	(4,256.93)	-11.16%		-11.16%	-11.16%	-5.77%	-5.77%	-5.77%	-5.77%	-5.77%	-4.15%	
341400	2018	0.00	0.00	4,098.95	(4,098.95)	NA		-21.90%	-21.90%	-21.90%	-11.32%	-11.32%	-11.32%	-11.32%	-11.32%	
341400	2019	0.00	0.00	0.00	0.00	NA		NA	-21.90%	-21.90%	-11.32%	-11.32%	-11.32%	-11.32%	-11.32%	
341400	2020	8,786.65	0.00	0.00	0.00	0.00%		0.00%	-46.65%	-17.80%	-17.80%	-17.80%	-10.11%	-10.11%	-10.11%	
342000	2004	3,304.47	0.00	0.00	0.00	0.00%										
342000	2005	0.00	0.00	0.00	0.00	NA		0.00%								
342000	2006	0.00	0.00	0.00	0.00	NA		NA	0.00%							
342000	2007	733.82	0.00	0.00	0.00	0.00%		0.00%	0.00%	0.00%						
342000	2008	0.00	0.00	0.00	0.00	NA		0.00%	0.00%	0.00%	0.00%					
342000	2009	0.00	0.00	0.00	0.00	NA		NA	0.00%	0.00%	0.00%	0.00%				
342000	2010	1,871.27	0.00	0.00	0.00	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%				
342000	2011	0.00	0.00	0.00	0.00	NA		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
342000	2012	0.00	0.00	0.00	0.00	NA		NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
342000	2013	1,115.56	0.00	0.00	0.00	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
342000	2014	2,499.54	0.00	0.00	0.00	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
342000	2015	681.90	0.00	0.00	0.00	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

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Account	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %
342000	2016	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
342000	2017	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
342000	2018	1,342.32	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
342000	2019	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
342000	2020	6,506.17	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
343000	2004	55,734.69	0.00	0.00	0.00	0.00%										
343000	2005	0.00	0.00	0.00	0.00	NA	0.00%									
343000	2006	5,054.06	0.00	0.00	0.00	0.00%	0.00%	0.00%								
343000	2007	15,986.66	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
343000	2008	77,306.89	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
343000	2009	22,498.05	0.00	62,476.05	(62,476.05)	-277.70%	-62.60%	-53.96%	-51.70%	-51.70%	-35.38%					
343000	2010	5,733.95	0.00	0.00	0.00	0.00%	-221.30%	-59.20%	-51.41%	-49.36%	-49.36%	-34.27%				
343000	2011	8,217.79	0.00	403.45	(403.45)	-4.91%	-2.89%	-172.51%	-55.28%	-48.46%	-46.65%	-46.65%	-33.00%			
343000	2012	8,810.10	0.00	0.00	0.00	0.00%	-2.37%	-1.77%	-138.93%	-51.30%	-45.38%	-43.79%		-31.54%		
343000	2013	833.59	0.00	0.00	0.00	0.00%	0.00%	-2.26%	-1.71%	-136.42%	-50.96%	-45.11%	-43.53%	-43.53%	-31.41%	
343000	2014	791,626.73	0.00	3,714.97	(3,714.97)	-0.47%	-0.47%	-0.46%	-0.51%	-0.51%	-7.95%	-7.28%	-7.15%	-7.11%	-7.11%	
343000	2015	2,672.29	0.00	1,629.20	(1,629.20)	-60.97%	-0.67%	-0.67%	-0.66%	-0.71%	-0.70%	-8.12%	-7.43%	-7.31%	-7.27%	
343000	2016	4,593.52	0.00	105.19	(105.19)	-2.29%	-23.87%	-0.68%	-0.68%	-0.67%	-0.72%	-0.71%	-8.09%	-7.41%	-7.28%	
343000	2017	13,859.18	0.00	964.49	(964.49)	-6.96%	-5.80%	-12.78%	-0.79%	-0.79%	-0.78%	-0.82%	-0.82%	-8.07%	-7.40%	
343000	2018	5,921.74	0.00	0.00	0.00	0.00%	-4.88%	-4.39%	-9.98%	-0.78%	-0.78%	-0.77%	-0.81%	-0.81%	-8.01%	-6.80%
343000	2019	1,278.94	18,285.71	518.33	17,767.38	1389.23%	246.75%	79.79%	65.09%	53.20%	1.38%	1.38%	1.37%	1.31%	1.30%	-5.34%
343000	2020	176,036.21	0.00	1,176.24	(1,176.24)	-0.67%	9.36%	9.05%	7.93%	7.70%	6.80%	1.02%	1.02%	1.01%	0.96%	-4.62%
344000	2004	75,460.17	0.00	0.00	0.00	0.00%										
344000	2005	0.00	0.00	0.00	0.00	NA	0.00%									
344000	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
344000	2007	24,965.33	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
344000	2008	10,551.26	0.00	0.00	0.00	0.00%	0.00%	0.00%		0.00%						
344000	2009	657.44	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
344000	2010	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
344000	2011	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
344000	2012	2,089.02	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
344000	2013	5,759.37	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
344000	2014	195,893.01	0.00	4,360.73	(4,360.73)	-2.23%	-2.16%	-2.14%	-2.14%	-2.14%	-2.13%	-2.03%	-1.82%	-1.82%	-1.82%	
344000	2015	0.00	0.00	7,010.51	(7,010.51)	NA	-5.80%	-5.64%	-5.58%	-5.58%	-5.58%	-5.56%	-5.29%	-4.74%	-4.74%	
344000	2016	0.00	0.00	0.00	0.00	NA	NA	-5.80%	-5.64%	-5.58%	-5.58%	-5.58%	-5.56%	-5.29%	-4.74%	
344000	2017	1,781.87	0.00	485.00	(485.00)	-27.22%	-27.22%	-420.65%	-6.00%	-5.83%	-5.77%	-5.77%	-5.77%	-5.75%	-5.47%	
344000	2018	0.00	0.00	0.00	0.00	NA	-27.22%	-27.22%	-420.65%	-6.00%	-5.83%	-5.77%	-5.77%	-5.77%	-5.75%	-3.74%
344000	2019	0.00	0.00	48.50	(48.50)	NA	NA	-29.94%	-29.94%	-423.38%	-6.02%	-5.85%	-5.79%	-5.79%	-5.79%	-4.93%
344000	2020	99,767.66	0.00	0.00	0.00	0.00%	-0.05%	-0.05%	-0.53%	-0.53%	-7.43%	-4.00%	-3.93%	-3.90%	-3.90%	-3.49%
345000	2004	81,212.01	0.00	0.00	0.00	0.00%										
345000	2005	0.00	0.00	0.00	0.00	NA	0.00%									
345000	2006	38,138.74	0.00	0.00	0.00	0.00%	0.00%	0.00%								
345000	2007	0.00	9,265.00	0.00	9,265.00	NA	24.29%	24.29%	7.76%							
345000	2008	134,038.83	12,720.00	0.00	12,720.00	9.49%	16.40%	12.77%	12.77%	8.68%						
345000	2009	16,686.79	9,265.00	0.00	9,265.00	55.52%	14.59%	20.73%	16.55%	16.55%	11.57%					
345000	2010	4,592.19	(5,265.00)	0.00	(5,265.00)	-114.65%	18.80%	10.77%	16.73%	13.43%	13.43%	9.46%				
345000	2011	15,606.36	0.00	481.27	(481.27)	-3.08%	-28.45%	9.54%	9.50%	14.92%	12.20%	12.20%	8.79%			
345000	2012	0.00	0.00	0.00	0.00	NA	-3.08%	-28.45%	9.54%	9.50%	14.92%	12.20%	12.20%	8.79%		
345000	2013	0.00	0.00	0.00	0.00	NA	NA	-3.08%	-28.45%	9.54%	9.50%	14.92%	12.20%	12.20%	8.79%	
345000	2014	243,449.21	0.00	0.00	0.00	0.00%	0.00%	0.00%	-0.19%	-2.18%	1.26%	3.92%	6.15%	5.64%	5.64%	
345000	2015	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	-0.19%	-2.18%	1.26%	3.92%	6.15%	5.64%	
345000	2016	593.18	0.00	228.40	(228.40)	-38.50%	-38.50%	-0.09%	-0.09%	-0.09%	-0.27%	-2.26%	1.17%	3.86%	6.09%	
345000	2017	4,786.36	0.00	357.51	(357.51)	-7.47%	-10.89%	-10.89%	-0.24%	-0.24%	-0.24%	-0.40%	-2.35%	1.03%	3.73%	
345000	2018	68,373.00	0.00	0.00	0.00	0.00%	-0.49%	-0.79%	-0.79%	-0.18%	-0.18%	-0.18%	-0.32%	-1.88%	0.83%	4.10%

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345000	2019	75.22	0.00	0.00	0.00	0.00%	0.00%	-0.49%	-0.79%	-0.79%	-0.18%	-0.18%	-0.18%	-0.32%	-1.88%	4.73%
345000	2020	407,802.16	0.00	0.00	0.00	0.00%	0.00%	0.00%	-0.07%	-0.12%	-0.12%	-0.08%	-0.08%	-0.08%	-0.14%	2.67%
346100	2004	177,160.36	0.00	0.00	0.00	0.00%										
346100	2005	0.00	0.00	0.00	0.00	NA	0.00%									
346100	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
346100	2007	66,084.81	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							
346100	2008	49,652.71	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
346100	2009	21,874.15	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
346100	2010	64,321.00	0.00	1,470.73	(1,470.73)	-2.29%	-1.71%	-1.08%	-0.73%	-0.73%	-0.73%	-0.39%				
346100	2011	9,415.40	0.00	251.73	(251.73)	-2.67%	-2.34%	-1.80%	-1.19%	-0.81%	-0.81%	-0.81%	-0.44%			
346100	2012	27,995.46	0.00	0.00	0.00	0.00%	-0.67%	-1.69%	-1.39%	-0.99%	-0.72%	-0.72%	-0.72%	-0.41%		
346100	2013	22,831.44	0.00	0.00	0.00	0.00%	0.00%	-0.42%	-1.38%	-1.18%	-0.88%	-0.66%	-0.66%	-0.66%	-0.39%	
346100	2014	2,751,412.14	0.00	72.69	(72.69)	0.00%	0.00%	0.00%	-0.01%	-0.06%	-0.06%	-0.06%	-0.06%	-0.06%	-0.06%	
346100	2015	750.00	0.00	620.51	(620.51)	-82.73%	-0.03%	-0.02%	-0.02%	-0.03%	-0.08%	-0.08%	-0.08%	-0.08%	-0.08%	
346100	2016	0.00	0.00		0.00	NA	-82.73%	-0.03%	-0.02%	-0.02%	-0.03%	-0.08%	-0.08%	-0.08%	-0.08%	
346100	2017	924,302.42	0.00	19,005.59	(19,005.59)	-2.06%	-2.06%	-2.12%	-0.54%	-0.53%	-0.53%	-0.53%	-0.56%	-0.56%	-0.55%	
346100	2018	4,902.38	0.00	4,765.41	(4,765.41)	-97.21%	-2.56%	-2.56%	-2.62%	-0.66%	-0.66%	-0.66%	-0.66%	-0.69%	-0.68%	-0.64%
346100	2019	2,907.47	0.00	0.15	(0.15)	-0.01%	-61.02%	-2.55%	-2.55%	-2.61%	-0.66%	-0.66%	-0.65%	-0.66%	-0.69%	-0.66%
346100	2020	1,441,692.53	0.00	1.67	(1.67)	0.00%	0.00%	-0.33%	-1.00%	-1.00%	-1.03%	-0.48%	-0.48%	-0.47%	-0.48%	-0.49%
346190	2010	0.00	0.00	7,055.01	(7,055.01)	NA										
346190	2011	0.00	0.00	9,588.55	(9,588.55)	NA	NA									
346190	2012	1,074.80	0.00	0.00	0.00	0.00%	-892.12%	-1548.53%								
346190	2013	7,508.00	0.00	11,616.46	(11,616.46)	-154.72%	-135.35%	-247.06%	-329.26%							
346190	2014	208,467.33	0.00	2,027.72	(2,027.72)	-0.97%	-6.32%	-6.29%		-13.95%	-10.70%					
346190	2015	27,535.58	0.00	3,051.94	(3,051.94)	-11.08%	-2.15%	-6.86%	-6.83%	-10.75%	-13.63%					
346190	2016	57,923.37	0.00	17,804.52	(17,804.52)	-30.74%	-24.41%	-7.79%	-11.45%	-11.40%	-14.57%	-16.91%				
346190	2017	2,931.26	0.00	(1,229.69)	1,229.69	41.95%	-27.24%	-22.20%	-7.29%	-10.93%	-10.89%	-14.03%	-16.34%			
346190	2018	130,242.29	0.00	4,332.92	(4,332.92)	-3.33%	-2.33%	-10.94%	-10.96%	-6.08%	-8.65%	-8.63%	-10.83%	-12.45%		
346190	2019	30,085.65	0.00	44,970.06	(44,970.06)	-149.47%	-30.75%	-29.45%	-29.78%	-27.71%	-15.52%	-17.77%	-17.73%	-19.79%	-21.30%	
346190	2020	190,039.79	0.00	3,949.35	(3,949.35)	-2.08%	-22.22%	-15.20%	-14.72%	-16.98%	-16.61%	-11.57%	-13.22%	-13.19%	-14.66%	
346200	2004	690.31	0.00	0.00	0.00	0.00%										
346200	2005	0.00	0.00	0.00	0.00	NA	0.00%									
346200	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
346200	2007	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%							
346200	2008	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%						
346200	2009	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%					
346200	2010	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	0.00%				
346200	2011	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	0.00%			
346200	2012	35,432.76	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
346200	2013	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
346200	2014	320,698.91	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
346200	2015	5,323.31	48.48	441.62	(393.14)	-7.39%	-0.12%	-0.12%	-0.11%	-0.11%	-0.11%	-0.11%	-0.11%	-0.11%	-0.11%	
346200	2016	0.00	0.00	0.00	0.00	NA	-7.39%	-0.12%	-0.12%	-0.11%	-0.11%	-0.11%	-0.11%	-0.11%	-0.11%	
346200	2017	7,212.00	0.00	0.00	0.00	0.00%	0.00%	-3.14%	-0.12%	-0.12%	-0.11%	-0.11%	-0.11%	-0.11%	-0.11%	
346200	2018	19,868.00	0.00	1,696.54	(1,696.54)	-8.54%	-6.26%	-6.26%	-6.45%	-0.59%	-0.59%	-0.54%	-0.54%	-0.54%	-0.54%	-0.54%
346200	2019	0.00	0.00	0.00	0.00	NA	-8.54%	-6.26%	-6.26%	-6.45%	-0.59%	-0.59%	-0.54%	-0.54%	-0.54%	-0.54%
346200	2020	1,238,766.94	0.00	(1.35)	1.35	0.00%	0.00%	-0.13%	-0.13%	-0.13%	-0.16%	-0.13%	-0.13%	-0.13%	-0.13%	-0.13%
347000	2004	939.38	0.00	0.00	0.00	0.00%										
347000	2005	0.00	0.00	0.00	0.00	NA	0.00%									
347000	2006	0.00	0.00	0.00	0.00	NA	NA	0.00%								
347000	2007	4,204.85	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%							

[illegible]

Acct	Activity Year	Gross		Cost of	Net	Net	2-yr	3-yr	4-yr	5-yr	6-yr	7-yr	8-yr	9-yr	10-yr	15-yr	20-yr
		Retirement	Salvage	Removal	Salvage	Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %
354400	2001	0	0	0	0	NA											
354400	2002	0	0	0	0	NA	NA										
354400	2003	0	0	0	0	NA	NA	NA									
354400	2004	0	0	0	0	NA	NA	NA	NA								
354400	2005	0	0	0	0	NA	NA	NA	NA	NA							
354400	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
354400	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
354400	2008	15,309	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
354400	2009	8,526	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
354400	2010	4,466	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
354400	2011	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
354400	2012	0	0	539	(539)	NA	NA	-12.06%	-4.15%	-1.90%	-1.90%	-1.90%	-1.90%	-1.90%	-1.90%	-1.90%	
354400	2013	2,943	0	0	0	0.00%	-18.31%	-18.31%	-7.27%	-3.38%	-1.72%	-1.72%	-1.72%	-1.72%	-1.72%	-1.72%	
354400	2014	24,735	0	10,465	(10,465)	-42.31%	-37.81%	-39.76%	-39.76%	-34.23%	-27.06%	-19.66%	-19.66%	-19.66%	-19.66%	-19.66%	
354400	2015	6241.27	0	4221.67	(4,222)	-67.64%	-47.41%	-43.30%	-44.89%	-44.89%	-39.66%	-32.46%	-24.47%	-24.47%	-24.47%	-24.47%	
354400	2016	13106.38	0	711.29	(711)	-5.43%	-25.50%	-34.93%	-32.74%	-33.89%	-33.89%	-30.95%	-26.55%	-21.16%	-21.16%	-21.16%	-24.47%
354400	2017	0	0	3597.5	(3,598)	NA	-32.88%	-44.09%	-43.09%	-40.39%	-41.54%	-41.54%	-37.94%	-26.54%	-21.97%	-25.93%	-25.93%
354400	2018	0	0	0	0	NA	NA	-32.88%	-44.09%	-43.09%	-40.39%	-41.54%	-41.54%	-26.21%	-23.52%	-25.93%	
354400	2019	13581.62	0	2301.71	(2,302)	-16.95%	-16.95%	-43.44%	-24.77%	-32.90%	-36.93%	-35.14%	-36.03%	-46.43%	-42.41%	-24.56%	
354400	2020	9467.44	0	1443.58	(1,444)	-15.25%	-16.25%	-16.25%	-31.86%	-22.28%	-28.95%	-33.87%	-32.45%	-33.22%	-33.22%	-23.66%	-23.66%
355400	2001	0	0	0	0	NA											
355400	2002	0	0	0	0	NA	NA										
355400	2003	0	0	0	0	NA	NA	NA									
355400	2004	0	0	0	0	NA	NA	NA	NA								
355400	2005	0	0	0	0	NA	NA	NA	NA	NA							
355400	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
355400	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
355400	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
355400	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
355400	2010	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
355400	2011	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
355400	2012	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
355400	2013	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
355400	2014	2,181	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
355400	2015	0	0	814.32	(814)	NA	-37.33%	-37.33%	-37.33%	-37.33%	-37.33%	-37.33%	-37.33%	-37.33%	-37.33%	-37.33%	
355400	2016	0	0	53.43	(53)	NA	NA	-39.78%	-39.78%	-39.78%	-39.78%	-39.78%	-39.78%	-39.78%	-39.78%	-39.78%	-37.33%
355400	2017	17308.76	0	2285.92	(2,286)	-13.21%	-13.52%	-18.22%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%
355400	2018	0	0	0	0	NA	-13.21%	-18.22%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%
355400	2019	0	0	0	0	NA	NA	-13.21%	-13.52%	-18.22%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%
355400	2020	0	0	0	0	NA	NA	NA	-13.21%	-13.52%	-18.22%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%	-16.18%
360000	2001	0	0	0	0	NA											
360000	2002	0	0	0	0	NA	NA										
360000	2003	0	0	0	0	NA	NA	NA									
360000	2004	0	0	0	0	NA	NA	NA	NA								
360000	2005	0	0	0	0	NA	NA	NA	NA	NA							
360000	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
360000	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
360000	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
360000	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
360000	2010	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
360000	2011	0	0	500	(500)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	

Acct	Activity Year	Net Salvage					2- yr	3- yr	4- yr	5- yr	6- yr	7- yr	8- yr	9- yr	10- yr	15- yr	20- yr
		Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %
360000	2012	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2013	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2014	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2015	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2016	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2017	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2018	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2019	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
360000	2020	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
361100	2001	0	0	0	0	NA											
361100	2002	0	0	0	0	NA	NA										
361100	2003	0	0	0	0	NA	NA	NA									
361100	2004	0	0	0	0	NA	NA	NA	NA								
361100	2005	0	0	0	0	NA	NA	NA	NA	NA							
361100	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
361100	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
361100	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
361100	2009	3,007	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
361100	2010	7,315	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
361100	2011	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
361100	2012	3,932	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
361100	2013	0	0	1,337	(1,337)	NA	-33.99%	-33.99%	-11.88%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%
361100	2014	0	0	0	0	NA	NA	-33.99%	-33.99%	-11.88%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%	-9.38%
361100	2015	2603.77	0	548	(548)	-21.05%	-21.05%	-72.38%	-28.83%	-28.83%	-13.61%	-11.18%	-11.18%	-11.18%	-11.18%	-11.18%	-11.18%
361100	2016	4771.99	0	0	0	0.00%	-7.43%	-16.67%	-25.55%	-16.67%	-16.67%	-10.12%	-8.71%	-8.71%	-8.71%	-8.71%	-8.71%
361100	2017	9101.22	0	2845.17	(2,845)	-31.26%	-20.51%	-20.59%	-20.59%	-28.70%	-23.17%	-23.17%	-17.06%	-15.39%	-15.39%	-15.39%	-15.39%
361100	2018	0	0	0	0	NA	-31.26%	-20.51%	-20.59%	-20.59%	-28.70%	-23.17%	-23.17%	-17.06%	-15.39%	-15.39%	-15.39%
361100	2019	0	0	0	0	NA	NA	-31.26%	-20.51%	-20.59%	-28.70%	-23.17%	-23.17%	-23.17%	-17.06%	-15.39%	-15.39%
361100	2020	0	0	0	0	NA	NA	NA	-31.26%	-20.51%	-20.59%	-20.59%	-28.70%	-23.17%	-23.17%	-15.39%	-15.39%
371100	2001	0	0	0	0	NA											
371100	2002	0	0	0	0	NA	NA										
371100	2003	0	0	0	0	NA	NA	NA									
371100	2004	0	0	0	0	NA	NA	NA	NA								
371100	2005	0	0	0	0	NA	NA	NA	NA	NA							
371100	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
371100	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
371100	2008	9,098	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
371100	2009	6,753	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
371100	2010	20,227	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
371100	2011	16,149	0	939	(939)	-5.82%	-2.58%	-2.18%	-1.80%	-1.80%	-1.80%	-1.80%	-1.80%	-1.80%	-1.80%	-1.80%	-1.80%
371100	2012	31,605	0	6,555	(6,555)	-20.74%	-15.69%	-11.02%	-10.03%	-8.94%	-8.94%	-8.94%	-8.94%	-8.94%	-8.94%	-8.94%	-8.94%
371100	2013	14,789	0	3,348	(3,348)	-22.64%	-21.35%	-17.34%	-13.10%	-12.11%	-10.99%	-10.99%	-10.99%	-10.99%	-10.99%	-10.99%	-10.99%
371100	2014	15,513	0	19,011	(19,011)	#####	-73.79%	-46.71%	-38.25%	-30.37%	-28.42%	-26.16%	-26.16%	-26.16%	-26.16%	-26.16%	-26.16%
371100	2015	28166.66	0	20749.08	(20,749)	-73.67%	-91.03%	-73.73%	-55.14%	-47.64%	-40.02%	-37.99%	-35.56%	-35.56%	-35.56%	-35.56%	-35.56%
371100	2016	40122.72	0	5380.38	(5,380)	-13.41%	-38.26%	-53.87%	-49.18%	-42.28%	-38.25%	-33.61%	-32.30%	-30.69%	-30.69%	-30.69%	-30.69%
371100	2017	23661.7	0	7531.56	(7,532)	-31.83%	-20.24%	-36.61%	-49.01%	-45.82%	-40.67%	-37.36%	-33.39%	-25.46%	-24.56%	-30.82%	-30.82%
371100	2018	7450.75	0	1636.17	(1,636)	-21.96%	-29.47%	-20.42%	-35.51%	-47.26%	-44.45%	-39.81%	-36.71%	-24.90%	-24.28%	-30.51%	-30.51%
371100	2019	45031.64	0	6937.35	(6,937)	-15.41%	-16.34%	-21.15%	-18.48%	-29.24%	-38.29%	-36.97%	-34.48%	-40.62%	-36.47%	-27.88%	-27.88%
371100	2020	18899.92	0	2238.44	(2,238)	-11.84%	-14.35%	-15.15%	-19.30%	-17.55%	-27.23%	-35.50%	-34.51%	-32.58%	-30.79%	-26.79%	-26.79%
371200	2015	0	0	0	0	NA											

**CALIFORNIA AMERICAN WATER
SEWER OPERATIONS
NET SALVAGE ANALYSIS**

Acct	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %	20- yr Net Salv. %
371200	2016	0	0	0	0	NA	NA										
371200	2017	0	0	0	0	NA	NA	NA									
371200	2018	526.23	0	69.9	(70)	-13.28%	-13.28%	-13.28%	-13.28%	-13.28%							
371200	2019	0	0	0	0	NA	-13.28%	-13.28%									
371200	2020	0	0	0	0	NA	NA	-13.28%	-13.28%	-13.28%	-13.28%						
380000	2001	0	0	0	0	NA											
380000	2002	0	0	0	0	NA	NA										
380000	2003	0	0	0	0	NA	NA	NA									
380000	2004	0	0	0	0	NA	NA	NA	NA								
380000	2005	0	0	0	0	NA	NA	NA	NA	NA							
380000	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
380000	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
380000	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
380000	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
380000	2010	1,030	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380000	2011	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380000	2012	3,554	0	2,000	(2,000)	-56.28%	-56.28%	-43.64%	-43.64%	-43.64%	-43.64%	-43.64%	-43.64%	-43.64%	-43.64%	-43.64%	-43.64%
380000	2013	33,363	0	1,401	(1,401)	-4.20%	-9.21%	-9.21%	-8.96%	-8.96%	-8.96%	-8.96%	-8.96%	-8.96%	-8.96%	-8.96%	-8.96%
380000	2014	15,174	0	0	0	0.00%	-2.89%	-6.53%	-6.53%	-6.40%	-6.40%	-6.40%	-6.40%	-6.40%	-6.40%	-6.40%	-6.40%
380000	2015	7155.12	0	7650.93	(7,651)	#####	-34.26%	-16.25%	-18.65%	-18.65%	-18.33%	-18.33%	-18.33%	-18.33%	-18.33%	-18.33%	-18.33%
380000	2016	2808.34	0	354.35	(354)	-12.62%	-80.35%	-31.85%	-16.08%	-18.38%	-18.38%	-18.08%	-18.08%	-18.08%	-18.08%	-18.08%	-18.08%
380000	2017	17070.78	0	2263.7	(2,264)	-13.26%	-13.17%	-37.99%	-24.33%	-15.44%	-17.28%	-17.28%	-17.05%	-15.13%	-15.13%	-17.05%	-17.05%
380000	2018	1899.58	0	1135.76	(1,136)	-59.79%	-17.92%	-17.24%	-39.42%	-25.86%	-16.53%	-18.27%	-18.27%	-10.70%	-10.70%	-18.04%	-18.04%
380000	2019	8276.7	0	1302.52	(1,303)	-15.74%	-23.96%	-17.26%	-16.82%	-34.15%	-24.26%	-16.45%	-18.04%	-19.88%	-19.88%	-17.83%	-17.83%
380000	2020	48017.17	0	20413.97	(20,414)	-42.51%	-38.58%	-39.27%	-33.37%	-32.62%	-38.86%	-32.99%	-25.81%	-26.60%	-26.60%	-26.40%	-26.40%
380100	2001	0	0	0	0	NA											
380100	2002	0	0	0	0	NA	NA										
380100	2003	0	0	0	0	NA	NA	NA									
380100	2004	0	0	0	0	NA	NA	NA	NA								
380100	2005	0	0	0	0	NA	NA	NA	NA	NA							
380100	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
380100	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
380100	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
380100	2009	9,345	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2010	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2011	0	0	0	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2012	0	0	0	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2013	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2014	0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2015	0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2016	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
380100	2017	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%
380100	2018	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%
380100	2019	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%
380100	2020	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%
380200	2001	0	0	0	0	NA											
380200	2002	0	0	0	0	NA	NA										
380200	2003	0	0	0	0	NA	NA	NA									
380200	2004	0	0	0	0	NA	NA	NA	NA								
380200	2005	0	0	0	0	NA	NA	NA	NA	NA							
380200	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
380200	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
380200	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				

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380200	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
380200	2010	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380200	2011	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380200	2012	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380200	2013	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380200	2014	0	0	461	(461)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380200	2015	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380200	2016	1850.03	0	273.12	(273)	-14.76%	-14.76%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%
380200	2017	0	0	0	0	NA	-14.76%	-14.76%	-39.69%	-39.69%	-39.69%	-39.69%	-39.69%	-9.96%	-9.96%	-39.69%	-39.69%
380200	2018	0	0	0	0	NA	NA	-14.76%	-14.76%	-39.69%	-39.69%	-39.69%	-39.69%	-5.79%	-5.79%	-39.69%	-39.69%
380200	2019	5517.68	0	713.47	(713)	-12.93%	-12.93%	-12.93%	-13.39%	-13.39%	-19.65%	-19.65%	-19.65%	-78.25%	-78.25%	-19.65%	-19.65%
380200	2020	5309.88	0	647.88	(648)	-12.20%	-12.57%	-12.57%	-12.57%	-12.89%	-12.89%	-16.53%	-16.53%	-16.53%	-16.53%	-16.53%	-16.53%
380300	2001	0	0	0	0	NA											
380300	2002	0	0	0	0	NA	NA										
380300	2003	0	0	0	0	NA	NA	NA									
380300	2004	0	0	0	0	NA	NA	NA	NA								
380300	2005	0	0	0	0	NA	NA	NA	NA	NA							
380300	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
380300	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
380300	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
380300	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
380300	2010	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380300	2011	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380300	2012	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380300	2013	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380300	2014	0	0	4,409	(4,409)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380300	2015	0	0	266.31	(266)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
380300	2016	0	0	22.34	(22)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
380300	2017	7242.61	0	0	0	0.00%	-0.31%	-3.99%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%
380300	2018	0	0	0	0	NA	0.00%	-0.31%	-3.99%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%
380300	2019	0	0	0	0	NA	NA	0.00%	-0.31%	-3.99%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%
380300	2020	0	0	0	0	NA	NA	NA	0.00%	-0.31%	-3.99%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%	-64.86%
380450	2015	0	0	879.27	(879)	NA											
380450	2016	0	0	0	0	NA	NA										
380450	2017	0	0	0	0	NA	NA	NA									
380450	2018	0	0	0	0	NA	NA	NA	NA								
380450	2019	0	0	0	0	NA	NA	NA	NA	NA							
380450	2020	0	0	0	0	NA	NA	NA	NA	NA	NA						
380450	2015	5823.41	0	0	0	0.00%											
380450	2016	0	0	264.82	(265)	NA	-4.55%										
380450	2017	0.01	0	0	0	0.00%	-2648200.00%	-4.55%									
380450	2018	0	0	194.54	(195)	NA	-1945400.00%	-7.89%									
380450	2019	0	0	26040.56	(26,041)	NA	NA	-262351000.00%	-264999200.00%	-455.06%							
380450	2020	0	0	2456.14	(2,456)	NA	NA	NA	-286912400.00%	#####	-497.23%						
380600	2001	0	0	0	0	NA											
380600	2002	0	0	0	0	NA	NA										
380600	2003	0	0	0	0	NA	NA	NA									
380600	2004	0	0	0	0	NA	NA	NA	NA								
380600	2005	0	0	0	0	NA	NA	NA	NA	NA							
380600	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
380600	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
380600	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				

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380600	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
380600	2010	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380600	2011	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380600	2012	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380600	2013	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380600	2014	0	0	2,122	(2,122)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
380600	2015	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380600	2016	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380600	2017	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380600	2018	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380600	2019	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
380600	2020	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
380625	2015	1229.48	0	0	0	0.00%											
380625	2016	1278.91	0	0	0	0.00%	0.00%										
380625	2017		0	0	0	NA	0.00%	0.00%									
380625	2018		0	0	0	NA	NA	0.00%	0.00%								
380625	2019	133504.77	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%							
380625	2020	15477.02	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%						
380 Combined	2001	0	0	0	0	NA											
380 Combined	2002	0	0	0	0	NA	NA										
380 Combined	2003	0	0	0	0	NA	NA	NA									
380 Combined	2004	0	0	0	0	NA	NA	NA	NA								
380 Combined	2005	0	0	0	0	NA	NA	NA	NA	NA							
380 Combined	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
380 Combined	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
380 Combined	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
380 Combined	2009	9,345	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
380 Combined	2010	1,030	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
380 Combined	2011	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
380 Combined	2012	3,554	0	2,000	(2,000)	-56.28%	-56.28%	-43.64%	-14.36%	-14.36%	-14.36%	-14.36%	-14.36%	-14.36%	-14.36%		
380 Combined	2013	33,363	0	1,401	(1,401)	-4.20%	-9.21%	-9.21%	-8.96%	-7.19%	-7.19%	-7.19%	-7.19%	-7.19%	-7.19%		
380 Combined	2014	15,174	0	6,992	(6,992)	-46.08%	-17.29%	-19.95%	-19.95%	-19.56%	-16.64%	-16.64%	-16.64%	-16.64%	-16.64%		
380 Combined	2015	14,208	0	8,797	(8,797)	-61.91%	-53.73%	-27.39%	-28.94%	-28.94%	-28.50%	-25.03%	-25.03%	-25.03%	-25.03%	-25.03%	
380 Combined	2016	5,937	0	915	(915)	-15.40%	-48.21%	-47.29%	-26.36%	-27.83%	-27.83%	-27.44%	-24.34%	-24.34%	-24.34%	-24.34%	
380 Combined	2017	24,313	0	2,264	(2,264)	-9.31%	-10.51%	-26.93%	-31.81%	-21.90%	-23.17%	-23.17%	-22.92%	-8.73%	-8.73%	-20.92%	
380 Combined	2018	1,900	0	1,330	(1,330)	-70.03%	-13.71%	-14.02%	-28.70%	-32.99%	-22.86%	-24.07%	-24.07%	-7.51%	-7.29%	-21.78%	
380 Combined	2019	147,299	0	28,057	(28,057)	-19.05%	-19.70%	-18.24%	-18.15%	-21.36%	-23.15%	-20.54%	-21.06%	-52.57%	-52.03%	-20.21%	
380 Combined	2020	68,804	0	23,518	(23,518)	-34.18%	-23.87%	-24.27%	-22.77%	-22.59%	-24.72%	-25.89%	-23.56%	-23.93%	-23.93%	-23.17%	-23.17%
381000	2001	0	0	0	0	NA											
381000	2002	0	0	0	0	NA	NA										
381000	2003	0	0	0	0	NA	NA	NA									
381000	2004	0	0	0	0	NA	NA	NA	NA								
381000	2005	0	0	0	0	NA	NA	NA	NA	NA							
381000	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
381000	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
381000	2008	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA				
381000	2009	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA			
381000	2010	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
381000	2011	32,889	0	4,120	(4,120)	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%		
381000	2012	0	0	0	0	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%		
381000	2013	0	0	0	0	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%		
381000	2014	0	0	0	0	NA	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%		
381000	2015	0	0	0	0	NA	NA	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	
381000	2016	0	0	0	0	NA	NA	NA	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	
381000	2017	0	0	0	0	NA	NA	NA	NA	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%	

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381000	2018	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%	-12.53%
381000	2019	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	-12.53%	-12.53%	-12.53%	-12.53%
381000	2020	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	-12.53%	-12.53%	-12.53%
389600	2015	0	0	0	0	NA											
389600	2016	0.01	0	0	0	0.00%	0.00%										
389600	2017	0	0	0	0	NA	0.00%	0.00%									
389600	2018	0	0	0	0	NA	NA	0.00%	0.00%								
389600	2019	0	0	0	0	NA	NA	NA	0.00%	0.00%							
389600	2020	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%						
390200	2001	0	0	0	0	NA											
390200	2002	0	0	0	0	NA	NA										
390200	2003	0	0	0	0	NA	NA	NA									
390200	2004	0	0	0	0	NA	NA	NA	NA								
390200	2005	0	0	0	0	NA	NA	NA	NA	NA							
390200	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
390200	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
390200	2008	1,863	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
390200	2009	2,539	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
390200	2010	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
390200	2011	0	0	0	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
390200	2012	0	0	0	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
390200	2013	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
390200	2014	0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
390200	2015	0	0	0	0	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
390200	2016	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
390200	2017	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%
390200	2018	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%
390200	2019	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%
390200	2020	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%
394000	2015	0	0	0	0	NA											
394000	2016	0	0	0	0	NA	NA										
394000	2017	242.74	0	26.11	(26)	-10.76%	-10.76%	-10.76%									
394000	2018	0	0	0	0	NA	-10.76%	-10.76%	-10.76%								
394000	2019	0	0	0	0	NA	NA	-10.76%	-10.76%	-10.76%							
394000	2020	0	0	0	0	NA	NA	NA	-10.76%	-10.76%	-10.76%						
396000	2015	0	0	0	0	NA											
396000	2016	0	0	0	0	NA	NA										
396000	2017	0	0	0	0	NA	NA	NA									
396000	2018	0	0	0	0	NA	NA	NA	NA								
396000	2019	0	0	2.34	(2)	NA	NA	NA	NA	NA							
396000	2020	0	0	0	0	NA	NA	NA	NA	NA	NA						
397000	2001	0	0	0	0	NA											
397000	2002	0	0	0	0	NA	NA										
397000	2003	0	0	0	0	NA	NA	NA									
397000	2004	0	0	0	0	NA	NA	NA	NA								
397000	2005	0	0	0	0	NA	NA	NA	NA	NA							
397000	2006	0	0	0	0	NA	NA	NA	NA	NA	NA						
397000	2007	0	0	0	0	NA	NA	NA	NA	NA	NA	NA					
397000	2008	8,883	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
397000	2009	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				

**CALIFORNIA AMERICAN WATER
SEWER OPERATIONS
NET SALVAGE ANALYSIS**

Acct	Activity Year	Retirement	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %	15- yr Net Salv. %	20- yr Net Salv. %
397000	2010	0	0	0	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
397000	2011	0	0	0	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
397000	2012	312	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
397000	2013	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
397000	2014	3,559	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
397000	2015	0	0	355.91	(356)	NA	-10.00%	-10.00%	-9.19%	-9.19%	-9.19%	-9.19%	-2.79%	-2.79%	-2.79%	-2.79%	
397000	2016	0	0	0	0	NA	NA	-10.00%	-10.00%	-9.19%	-9.19%	-9.19%	-9.19%	-2.79%	-2.79%	-2.79%	
397000	2017	0	0	0	0	NA	NA	NA	-10.00%	-10.00%	-9.19%	-9.19%	-9.19%	-9.19%	-2.79%	-2.79%	
397000	2018	0	0	0	0	NA	NA	NA	NA	-10.00%	-10.00%	-9.19%	-9.19%	-9.19%	-9.19%	-2.79%	
397000	2019	0	0	0	0	NA	NA	NA	NA	NA	-10.00%	-10.00%	-9.19%	-9.19%	-9.19%	-2.79%	
397000	2020	0	0	0	0	NA	NA	NA	NA	NA	NA	-10.00%	-10.00%	-9.19%	-9.19%	-2.79%	-2.79%

APPENDIX E
Summary of Reserve Reallocation

**CALIFORNIA AMERICAN WATER
RESERVE REALLOCATION
BY DISTRICT AT DECEMBER 31, 2020**

		Per Book Data				Reallocation Accumulated Depreciation				
District	Function	Account	Plant	Life Reserve	COR Reserve	Total Reserve	Total Reserve	Reallocated Life Reserve	Reallocated COR Reserve	
LARKFIELD										
	Source of Supply	304100-Struct & Imp-Supply	205,636.68	104,329.69	5,998.69	110,328.38	304100 Total	106,154.42	58,292.09	47,862.33
		307000-Wells & Springs	1,964,483.97	688,391.51	337,872.63	1,026,264.14	307000 Total	983,476.87	751,206.79	232,270.09
		309000-Supply Mains	172,839.30	32,542.51	11,414.02	43,956.53	309000 Total	90,917.76	15,764.83	75,152.93
	Source of Supply Total		2,342,959.95	825,263.71	355,285.34	1,180,549.05	Subtotal	1,180,549.05	825,263.71	355,285.34
	Pumping Equipment	304200-Struct & Imp-Pumping	224,544.37	113,461.18	6,901.91	120,363.09	304200 Total	43,011.48	39,561.32	3,450.16
		310000-Power Generation Equip	5,366.90	(7,945.17)	1,080.94	(6,864.23)	310000 Total	3,669.13	3,021.63	647.50
		311200-Pump Eqp Electric	944,364.73	587,262.34	53,238.86	640,501.20	311200 Total	705,334.14	648,008.75	57,325.39
		311400-Pump Eqp Hydraulic	1,841.61	(1,514.06)	261.88	(1,252.18)	311400 Total	782.99	720.18	62.81
		311540-Pump Eqp T&D	-	47.59	2.27	49.86				
	Pumping Equipment Total		1,176,117.61	691,311.88	61,485.86	752,797.74	Subtotal	752,797.74	691,311.88	61,485.86
	Water Treatment	304300-Struct & Imp-Treatment	442,703.14	258,878.56	(13,215.21)	245,663.35	304300 Total	211,581.31	196,128.72	15,452.59
		320100-WT Equip Non-Media	1,610,838.14	607,812.32	93,627.06	701,439.38	320100 Total	633,579.07	587,306.36	46,272.71
		320200-WT Equip Filter Media	135,666.43	(2,777.12)	(12,345.79)	(15,122.91)	320200 Total	86,819.44	80,478.68	6,340.76
	Water Treatment Total		2,189,207.71	863,913.76	68,066.06	931,979.82	Subtotal	931,979.82	863,913.76	68,066.06
	Transmission and Distrit	304400-Struct & Imp-T&D	447,178.14	150,252.32	10,574.79	160,827.11	304400 Total	137,416.37	129,565.21	7,851.15
		330000-Dist Reservoirs & Standpipes	1,472,218.46	599,636.40	55,786.06	655,422.46	330000 Total	486,792.59	425,605.25	61,187.34
		330100-Elevated Tanks & Standpipes	7,895.60	(2,931.81)	(2,556.33)	(5,488.14)	330100 Total	2,242.98	1,961.05	281.93
		330200-Ground Level Tanks	207,003.68	46,280.02	1,300.94	47,580.96	330200 Total	28,946.10	25,307.73	3,638.38
		331001-TD Mains Not Classified	179,791.26	791,390.75	19,203.66	810,594.41	331001 Total	83,295.03	63,664.23	19,630.80
		331100-TD Mains 4in & Less	237,247.75	41,448.13	19,610.85	61,058.98	331100 Total	101,351.74	77,465.37	23,886.37
		331200-TD Mains 6in to 8in	2,980,299.15	659,756.46	280,414.18	940,170.64	331200 Total	1,515,588.61	1,158,397.85	357,190.77
		331300-TD Mains 10in to 16in	1,595,533.53	366,916.87	153,942.10	520,858.97	331300 Total	744,547.88	569,074.39	175,473.49
		332000-Fire Mains	17,961.39	3,234.90	879.33	4,114.23	332000 Total	2,683.24	2,050.86	632.38
		333000-Services	2,113,069.90	712,378.90	500,873.17	1,213,252.07	333000 Total	1,110,476.76	811,374.07	299,102.69
		334100-Meters	866,650.43	369,383.63	(15,984.68)	353,398.95	334100 Total	425,347.90	380,473.68	44,874.22
		334200-Meter Installations	-	47.00	-	47.00		0.00	0.00	0.00
		335000-Hydrants	612,421.02	184,760.83	49,384.47	234,145.30	335000 Total	357,293.75	277,614.72	79,679.03
	Transmission and Distributon Total		10,737,270.31	3,922,554.40	1,073,428.54	4,995,982.94	Subtotal	4,995,982.94	3,922,554.40	1,073,428.54
	General	304500-Struct & Imp-General	67,294.05	15,293.79	955.13	16,248.92	304500 Total	1,840.52	29,997.38	(28,156.86)
		304600-Struct & Imp-Offices	-	(10,097.87)	54.75	(10,043.12)				
		339100-Other P/E-Intangible	109,368.58	72,258.20	-	72,258.20	339100 Total	109,368.58	109,368.58	0.00
		340100-Office Furniture & Equip	40,889.56	28,320.62	(63.44)	28,257.18	340100 Total	6,255.62	6,255.62	0.00
		340200-Comp & Periph Equip	11,496.50	4,223.98	(161.23)	4,062.75	340200 Total	7,856.72	7,856.72	0.00
		340300-Computer Software	-	-	(1,418.25)	(1,418.25)		0.00	0.00	
		341100-Trans Equip Lt Duty Trks	-	3,260.16	(4,534.90)	(1,274.74)		0.00	0.00	
		341200-Trans Equip Hvy Duty Trks	477.00	477.00	(2,699.88)	(2,222.88)	341200 Total	429.30	429.30	0.00
		343000-Tools,Shop,Garage Equip	61,160.15	40,053.36	(105.74)	39,947.62	343000 Total	26,294.45	26,294.45	0.00
		344000-Laboratory Equipment	-	(214.90)	-	(214.90)				
		345000-Power Operated Equipment	57,826.74	20,008.33	(1,052.70)	18,955.63	345000 Total	2,468.77	2,468.77	0.00
		346100-Comm Equip Non-Telephone	22,051.73	14,940.27	(72.69)	14,867.58	346100 Total	5,468.71	5,468.71	0.00
		346190-Remote Control & Instrument	276,724.53	125,281.20	(18,207.64)	107,073.56	346190 Total	151,012.46	151,012.46	0.00
		347000-Misc Equipment	40,370.07	10,417.31	(850.27)	9,567.04	347000 Total	1,610.17	1,610.17	0.00
		348000-Other Tangible Property	23,969.90	20,415.43	-	20,415.43	348000 Total	3,874.72	3,874.72	0.00
	General Total		711,628.81	344,636.88	(28,156.86)	316,480.02	Subtotal	316,480.02	344,636.88	(28,156.86)
	Total		17,157,184.39	6,647,680.63	1,530,108.94	8,177,789.57	Total Larkfield	8,177,789.57	6,647,680.63	1,530,108.94

LOS ANGELES

Source of Supply	304100-Struct & Imp-Supply	1,055,710.01	84,025.78	(59,247.18)	24,778.60	304100 Total	67,837.58	58,430.26	9,407.31
	305000-Collect & Impound Reservoirs	55,920.26	20,690.18	(100.89)	20,589.29	305000 Total	16,518.86	16,518.86	0.00
	306000-Lake, River & Other Intakes	350,312.98	13,839.69	(16,222.05)	(2,382.36)	306000 Total	22,292.46	22,292.46	0.00
	307000-Wells & Springs	15,727,891.28	3,479,816.35	1,312,355.32	4,792,171.67	307000 Total	4,751,507.73	3,538,881.65	1,212,626.08
	309000-Supply Mains	292,088.19	100,172.51	12,664.34	112,836.85	309000 Total	89,837.42	62,421.28	27,416.14
Source of Supply Total		17,481,922.72	3,698,544.51	1,249,449.54	4,947,994.05	Subtotal	4,947,994.05	3,698,544.51	1,249,449.54
Pumping Equipment	304200-Struct & Imp-Pumping	1,849,559.38	434,383.39	12,559.91	446,943.30	304200 Total	364,710.15	356,762.82	7,947.33
	310000-Power Generation Equip	5,939.90	5,482.09	-	5,482.09	310000 Total	3,406.41	3,332.18	74.23
	311200-Pump Eqp Electric	13,655,859.00	5,356,326.75	116,652.12	5,472,978.87	311200 Total	5,560,316.16	5,439,152.34	121,163.83

**CALIFORNIA AMERICAN WATER
RESERVE REALLOCATION
BY DISTRICT AT DECEMBER 31, 2020**

District	Function	Account	Per Book Data				Reallocation Accumulated Depreciation			
			Plant	Life Reserve	COR Reserve	Total Reserve	Reallocated Life			Reallocated COR Reserve
							Total Reserve	Reserve		
		311540-Pump Eqp T&D	3,524.20	4,251.19	-	4,251.19	311540 Total	1,222.73	1,196.08	26.64
	Pumping Equipment Total		15,514,882.48	5,800,443.42	129,212.03	5,929,655.45	Subtotal	5,929,655.45	5,800,443.42	129,212.03
	Water Treatment	304300-Struct & Imp-Treatment	395,437.61	126,996.57	(49,855.75)	77,140.82	304300 Total	139,430.06	135,686.17	3,743.89
		320100-WT Equip Non-Media	2,336,663.94	704,022.28	72,779.58	776,801.86	320100 Total	714,575.62	695,402.02	19,173.60
		320190-WT Equip-Basin, Clearwell	157.68	206.43	-	206.43	320190 Total	140.36	136.59	3.77
		320193-WT Equip-Chemical Feed	108.00	93.05	-	93.05	320193 Total	96.13	93.55	2.58
	Water Treatment Total		2,732,367.23	831,318.33	22,923.83	854,242.16	Subtotal	854,242.16	831,318.33	22,923.83
	Transmission and Distributon	304400-Struct & Imp-T&D	101,365.08	20,404.16	(740.85)	19,663.31	304400 Total	21,334.33	21,334.33	0.00
		330000-Dist Reservoirs & Standpipes	10,101,866.96	3,538,423.72	710,697.32	4,249,121.04	330000 Total	2,680,953.24	2,588,122.56	92,830.68
		331001-TD Mains Not Classified	3,411,676.24	386,838.60	260,214.67	647,053.27	331001 Total	514,403.95	481,006.92	33,397.03
		331100-TD Mains 4in & Less	3,255,862.58	774,191.45	(164,940.84)	609,250.61	331100 Total	793,690.88	742,161.50	51,529.38
		331200-TD Mains 6in to 8in	27,033,566.59	9,259,184.54	1,970,424.57	11,229,609.11	331200 Total	9,201,650.25	8,604,244.67	597,405.57
		331300-TD Mains 10in to 16in	21,365,402.71	7,654,666.54	1,708,478.80	9,363,145.34	331300 Total	7,346,918.21	6,869,928.78	476,989.43
		331400-TD Mains 18in & Grtr	1,542,944.69	118,465.40	228.60	118,694.00	331400 Total	142,785.03	133,514.89	9,270.14
		333000-Services	32,398,804.06	6,886,823.92	(1,331,754.42)	5,555,069.50	333000 Total	9,678,389.81	8,960,267.19	718,122.62
		334100-Meters	9,106,804.10	3,320,116.85	(1,003,750.30)	2,316,366.55	334100 Total	3,516,190.21	3,414,730.56	101,459.66
		334102-Meters greater than 1in	57,028.42	2,517.47	(7,834.44)	(5,316.97)	334102 Total	2,119.03	2,057.88	61.14
		334200-Meter Installations	456,575.02	287,713.86	(11,324.61)	276,389.25	334200 Total	149,200.20	146,851.92	2,348.28
		334300-Meter Vaults	8,642.52	1,928.22	-	1,928.22	334300 Total	2,372.46	2,335.12	37.34
		335000-Hydrants	5,661,568.96	1,519,427.20	71,841.83	1,591,269.03	335000 Total	1,922,234.67	1,804,145.61	118,089.06
	Transmission and Distributon Total		114,502,107.93	33,770,701.93	2,201,540.33	35,972,242.26	Subtotal	35,972,242.26	33,770,701.93	2,201,540.33
General		304500-Struct & Imp-General	468,144.38	84,421.18	1,560.28	85,981.46	304500 Total	36,376.43	70,300.95	(33,924.52)
		304600-Struct & Imp-Offices	354,252.38	59,924.76	3,274.16	63,198.92	304600 Total	71,313.65	137,820.49	(66,506.84)
		304700-Struct & Imp-Store, Shop, Gar	277,051.53	227,394.14	2,792.77	230,186.91	304700 Total	81,622.93	157,744.16	(76,121.24)
		339500-Other P/E-TD	169,826.33	142,902.24	17,768.68	160,670.92	339500 Total	36,580.42	36,580.42	0.00
		340100-Office Furniture & Equip	224,142.14	91,508.75	(3,428.71)	88,080.04	340100 Total	69,171.47	69,171.47	0.00
		340200-Comp & Periph Equip	173,375.60	41,399.23	(9,040.16)	32,359.07	340200 Total	55,065.53	55,065.53	0.00
		340300-Computer Software	-	(100.88)	-	(100.88)	340300 Total	6,608.23	0.00	0.00
		340500-Other Office Equipment	13,985.11	1,273.92	-	1,273.92	340500 Total	440.48	6,608.23	0.00
		341100-Trans Equip Lt Duty Trks	26,483.40	1,498.28	(11,847.20)	(10,348.92)	341100 Total	10,665.49	440.48	0.00
		341200-Trans Equip Hvy Duty Trks	69,100.38	33,771.84	(24,460.32)	9,311.52	341200 Total	10,665.49	10,665.49	0.00
		341300-Trans Equip Autos	-	90.52	(0.49)	90.03	341300 Total	15,238.89	15,238.89	0.00
		341400-Trans Equip Other	71,347.25	55,878.22	(167.85)	55,710.37	342000 Total	871.56	871.56	0.00
		342000-Stores Equipment	2,502.30	2,292.99	-	2,292.99	343000 Total	77,453.82	77,453.82	0.00
		343000-Tools, Shop, Garage Equip	209,807.31	105,930.92	(1,631.26)	104,299.66	344000 Total	132.04	132.04	0.00
		344000-Laboratory Equipment	4,801.98	142.44	(48.50)	93.94	345000 Total	4,778.09	4,778.09	0.00
		345000-Power Operated Equipment	33,344.81	27,536.53	(4,150.49)	23,386.04	346100 Total	1,041,702.03	1,041,702.03	0.00
		346100-Comm Equip Non-Telephone	1,202,576.98	928,934.22	(131,494.28)	797,439.94	346190 Total	331,699.35	331,699.35	0.00
		346190-Remote Control & Instrument	422,154.69	171,047.56	(2,469.66)	168,577.90	347000 Total	11,694.34	11,694.34	0.00
		347000-Misc Equipment	73,084.80	52,530.18	(13,209.57)	39,320.61			0.00	0.00
		348000-Other Tangible Property	-	(409.69)	-	(409.69)			0.00	0.00
General Total			3,795,981.37	2,027,967.35	(176,552.60)	1,851,414.75	Subtotal	1,851,414.75	2,027,967.35	(176,552.60)
			154,027,261.73	46,128,975.54	3,426,573.13	49,555,548.67	Total Los Angeles	49,555,548.67	46,128,975.54	3,426,573.13

MONTEREY WATER

Source of Supply	304100-Struct & Imp-Supply	4,755,118.77	708,588.14	(46,522.60)	662,065.54	304100 Total	1,092,646.83	932,059.98	160,586.86
	305000-Collect & Impound Reservoirs	1,815,477.81	875,562.30	360,658.87	1,236,221.17	305000 Total	1,594,312.48	1,594,312.48	0.00
	306000-Lake, River & Other Intakes	57,852.15	11,144.76	-	11,144.76	306000 Total	13,448.29	13,448.29	0.00
	307000-Well & Springs	14,618,453.92	5,676,060.51	1,622,857.62	7,298,918.13	307000 Total	6,743,414.48	4,919,361.43	1,824,053.05
	309000-Supply Mains	4,968,687.76	1,683,238.96	768,456.89	2,451,695.85	309000 Total	2,216,223.37	1,495,412.49	720,810.87
Source of Supply Total		26,215,590.41	8,954,594.67	2,705,450.78	11,660,045.45	Subtotal	11,660,045.45	8,954,594.67	2,705,450.78
Pumping Equipment	304200-Struct & Imp-Pumping	6,303,387.94	1,451,480.05	9,184.23	1,460,664.28	304200 Total	1,190,887.74	1,135,311.64	55,576.10
	310000-Power Generation Equip	1,889,699.63	1,071,334.64	5,329.05	1,076,663.69	310000 Total	688,954.20	656,802.23	32,151.97
	311200-Pump Eqp Electric	22,000,035.92	4,679,661.66	342,500.72	5,022,162.38	311200 Total	5,665,229.45	5,400,845.71	264,383.73
	311300-Pump Eqp Diesel	62,926.20	27,587.97	3,797.37	31,385.34				

Per Book Data						Reallocation Accumulated Depreciation				
District	Function	Account	Plant	Life Reserve	COR Reserve	Total Reserve	Reallocated Life			
							Total Reserve	Reserve	Reallocated COR Reserve	
Pumping Equipment		311400-Pump Eqp Hydraulic	195,421.00	42,097.26	(8,122.22)	33,975.04	311300 Total	19,892.41	18,964.07	928.33
		311500-Pump Eqp Other	411,863.96	51,693.83	4,339.95	56,033.78	311400 Total	40,542.39	38,650.37	1,892.02
		311540-Pump Eqp T&D	-	-	1,490.35	1,490.35	311500 Total	76,868.67	73,281.38	3,587.29
		Pumping Equipment Total	30,863,334.65	7,323,855.41	358,519.45	7,682,374.86	Subtotal	7,682,374.86	7,323,855.41	358,519.45
	Water Treatment	304300-Struct & Imp-Treatment	10,095,454.55	5,013,976.19	97,284.67	5,111,260.86	304300 Total	5,403,905.39	5,021,181.82	382,723.57
		320100-WT Equip Non-Media	20,818,680.60	10,082,751.85	1,081,330.74	11,164,082.59	320100 Total	10,986,715.37	10,210,040.61	776,674.76
		320200-WT Equip Filter Media	539,159.71	429,019.01	3,182.30	432,201.31	320200 Total	316,924.00	294,524.62	22,399.38
	Water Treatment Total	31,453,294.86	15,525,747.05	1,181,797.71	16,707,544.76	Subtotal	16,707,544.76	15,525,747.05	1,181,797.71	
	Transmission and Distrib	304400-Struct & Imp-T&D	944,359.39	243,727.06	(121,738.96)	121,988.10	304400 Total	270,037.39	254,973.55	15,063.84
		330000-Dist Reservoirs & Standpipes	18,067,998.03	4,570,233.08	788,609.20	5,358,842.28	330000 Total	5,518,641.88	4,841,364.30	677,277.58
330200-Ground Level Tanks		8,629,286.32	926,871.57	(429,865.51)	497,006.06	330200 Total	680,825.24	597,270.68	83,554.56	
331001-TD Mains Not Classified		114,007.79	36,119.27	(1,039.98)	35,079.29	331001 Total	31,667.43	24,380.44	7,287.00	
331100-TD Mains 4in & Less		9,392,875.67	1,698,087.65	(129,495.52)	1,568,592.13	331100 Total	2,455,908.32	1,890,762.27	565,146.05	
331200-TD Mains 6in to 8in		66,632,641.60	17,235,296.77	6,813,802.90	24,049,099.67	331200 Total	20,638,854.57	15,889,644.83	4,749,209.73	
331300-TD Mains 10in to 16in		33,201,629.28	11,132,735.99	4,416,715.05	15,549,451.04	331300 Total	15,343,552.99	11,812,343.01	3,531,209.98	
331400-TD Mains 18in & Grtr		68,822,186.97	3,595,148.82	2,207,097.89	5,802,246.71	331400 Total	4,863,327.72	3,744,226.69	1,119,101.03	
333000-Services		32,558,617.39	9,847,813.78	2,688,517.18	12,536,330.96	333000 Total	13,428,929.04	9,897,348.75	3,531,580.29	
334100-Meters		12,114,276.94	4,819,195.29	(1,009,511.95)	3,809,683.34	334100 Total	4,982,644.94	4,466,772.54	515,872.41	
334300-Meter Vaults		734,401.00	37,165.28	176.52	37,341.80	334300 Total	46,258.32	43,677.83	2,580.49	
335000-Hydrants		10,136,996.83	2,236,168.97	386,214.42	2,622,383.39	335000 Total	3,727,396.93	2,915,798.64	811,598.29	
Transmission and Distributon Total		261,349,277.21	56,378,563.53	15,608,481.24	71,988,044.77	Subtotal	71,988,044.77	56,378,563.53	15,609,481.24	
General		304500-Struct & Imp-General	1,783,732.29	573,384.48	10,679.46	584,063.94	304500 Total	197,486.09	429,647.90	(232,161.81)
		304600-Struct & Imp-Offices	229,863.85	28,926.21	(16,139.46)	12,786.75	304600 Total	21,791.49	47,409.25	(25,617.76)
		304700-Struct & Imp-Store,Shop,Gar	166,313.71	32,075.63	1,777.07	33,852.70	304700 Total	36,605.42	79,638.24	(43,032.81)
		304800-Struct & Imp-Misc	115,947.95	81,145.38	3,829.44	84,974.82	304800 Total	22,530.30	22,530.30	0.00
		339100-Other P/E-Intangible	-	(33,897.08)	-	(33,897.08)	339200 Total	49,876.10	49,876.10	0.00
		339200-Other P/E-Supply	124,289.52	102,131.69	-	102,131.69	339500 Total	241,691.46	241,691.46	0.00
		339500-Other P/E-TD	1,964,331.77	636,234.68	12.96	636,247.64	339600 Total	6,298.10	6,298.10	0.00

CALIFORNIA AMERICAN WATER
RESERVE REALLOCATION
BY DISTRICT AT DECEMBER 31, 2020

District	Function	Account	Per Book Data				Reallocation Accumulated Depreciation			
			Plant	Life Reserve	COR Reserve	Total Reserve	Reallocated Life			
							Total Reserve	Reserve	Reallocated COR Reserve	
Fruitridge Hillview	304200	304200	2,636,373.50	753,170.59	-	753,170.59	753,170.59	753,170.59		
		304200	23,103.52	16,960.75		16,960.75	16,960.75	16,960.75		
	310000-Power Generation Equip	310000	2,586,923.03	688,673.23	88,313.31	776,986.54	764,519.09	717,347.00		47,172.08
		310000	-	-	-	-	0.00	0.00		
	311100-Pump Eqp Steam	311100	319,621.65	11,258.40		11,258.40	11,258.40	11,258.40		
		311100-Pump Eqp Electric	-	(0.82)	-	(0.82)		0.00		
	311200-Pump Eqp Electric	311200	33,105,289.27	14,527,701.65	914,243.87	15,441,945.52	14,865,177.15	13,944,014.42		921,162.72
		311200	3,949,155.06	1,805,859.92	-	1,805,859.92	1,805,859.92	1,805,859.92		
	311400-Pump Eqp Hydraulic	311400	620,566.26	206,267.61		206,267.61	206,267.61	206,267.61		
		311500-Pump Eqp Other	1,219,605.69	388,715.05	50,251.83	438,966.88	375,533.52	352,362.48		23,171.03
Pumping Equipment Total	311540-Pump Eqp T&D	311540	1,138,298.07	220,867.40	14,035.12	234,902.52	260,125.94	244,075.75		16,050.20
			-	186,992.41	9,302.43	196,294.84				
	Subtotal		57,967,757.83	20,432,853.81	1,164,163.73	21,597,017.54	21,597,017.54	20,432,853.81		1,164,163.73
Water Treatment	304300-Struct & Imp-Treatment	304300	10,301,960.14	3,052,026.63	(21,333.85)	3,030,692.78	3,691,099.70	3,582,263.29		108,836.40
		304300-Struct & Imp-Treatment	20,011.52	8,914.96		8,914.96	8,914.96	8,914.96		
	320100-WT Equip Non-Media	320100	30,845,540.42	11,500,618.87	549,342.76	12,049,961.63	11,586,404.33	11,244,715.41		341,688.92
		320100	1,185,067.24	31,534.39	-	31,534.39	31,534.39	31,534.39		
	320193	320193	2,627,525.62	822,351.56	-	822,351.56	822,351.56	822,351.56		
		320200-WT Equip Filter Media	1,675,291.71	961,009.98	(56,621.50)	904,388.48	707,538.86	686,676.77		20,862.09
	Subtotal		46,655,396.65	16,376,456.40	471,387.41	16,847,843.81	16,847,843.81	16,376,456.40		471,387.41
Transmission and Distributon Total	304400-Struct & Imp-T&D	304400	1,174,861.74	171,717.71	(7,050.69)	164,667.02	380,124.53	370,025.83		10,098.70
		304400	11,252.89	7,359.76		7,359.76	7,359.76	7,359.76		0.00
	330000-Dist Reservoirs & Standpipes	330000	6,041,320.91	2,977,506.04	157,023.42	3,134,529.46	2,165,248.86	2,038,713.63		126,535.23
		330000	104,558.89	68,241.10		68,241.10	68,241.10	68,241.10		0.00
	330002-Tank Original Painting	330002	24,605.54	3,679.85	500.39	4,180.24	4,134.20	3,892.60		241.60
		330003-Tank Repainting	609,460.69	26,647.10	1,612.10	28,259.20	102,574.99	96,580.60		5,994.39
	330200-Ground Level Tanks	330200	13,012,497.13	1,518,510.02	95,149.98	1,613,660.00	1,172,195.15	1,103,693.10		68,502.05
		330300-Below Ground Tanks	26,881.59	2,016.12	-	2,016.12	2,016.12	2,016.12		0.00
	331001-TD Mains Not Classified	331001	4,246,436.21	502,670.01	-	502,670.01	502,670.01	502,670.01		0.00
		331001	124,059.55	39,080.49	3,470.32	42,550.81	24,043.39	22,638.31		1,405.07
Fruitridge Hillview	331001-TD Mains 4in & Less	331001	9,318.02	5,865.71		5,865.71	5,865.71	5,865.71		0.00
		331001	2,158,246.63	146,998.32	137,059.81	284,058.13	399,939.67	356,116.94		43,822.73
	331100-TD Mains 6in to 8in	331100	6,942,672.44	2,381,239.18		2,381,239.18	2,381,239.18	2,381,239.18		0.00
		331100	7,423,994.81	3,566,799.55	-	3,566,799.55	3,566,799.55	3,566,799.55		0.00
	331200-TD Mains 10in to 16in	331200	41,237,780.04	20,813,048.86	2,610,584.08	23,423,632.94	25,939,434.23	23,097,163.63		2,842,270.60
		331200	33,368.67	6,535.92	-	6,535.92	6,535.92	6,535.92		0.00
	331300-TD Mains 18in & Grtr	331300	86,433.07	71,025.25		71,025.25	71,025.25	71,025.25		0.00
		331300	25,673,724.98	3,874,384.72	629,172.30	4,503,557.02	5,314,272.76	4,731,970.11		582,302.65
	331400-TD Mains 24in & Grtr	331400	21,935.45	4,091.23	-	4,091.23	4,091.23	4,091.23		0.00
		331400	85,772.48	54,926.17		54,926.17	54,926.17	54,926.17		0.00
Fruitridge Hillview	331500-Hydrants	331500	26,952,745.74	3,662,817.63	254,442.11	3,917,259.74	5,494,929.67	4,892,831.84		602,097.83
		331500	61,435.46	40,216.82		40,216.82	40,216.82	40,216.82		0.00
	331600-Office Furniture & Equip	331600	6,686,782.25	776,536.96	116,637.47	893,174.43	1,083,282.73	964,583.81		118,698.91
		331600	20,424.51	3,683.75	925.23	4,608.98	5,270.51	4,693.00		577.51
	331700-Computer Software	331700	31,778,603.30	14,923,931.83	3,848,444.97	18,772,376.80	15,938,171.63	13,942,287.29		1,995,884.33
		331700	1,343,461.87	596,315.50		596,315.50	596,315.50	596,315.50		0.00
	331800-Meter Installations	331800	769,153.06	604,088.31		604,088.31	604,088.31	604,088.31		0.00
		331800	20,932,117.70	10,793,270.13	(232,559.12)	10,560,711.01	13,474,809.84	12,810,740.98		664,068.85
	331900-Other P/E-Intangible	331900	724,246.10	266,669.16	-	266,669.16	266,669.16	266,669.16		0.00
		331900	106,957.11	26,270.31		26,270.31	26,270.31	26,270.31		0.00
General	304500-Struct & Imp-General	304500	33,483,638.61	17,301,722.42	(16,089.05)	17,285,633.37	12,036,577.70	11,716,847.25		319,730.45
		304500	11,465,368.86	4,894,435.39	450,957.82	5,345,393.21	6,443,242.51	5,775,192.27		668,050.24
	304600-Comp & Periph Equip	304600	229,660.98	120,673.90	-	120,673.90	120,673.90	120,673.90		0.00
		304600	133,663.67	98,985.64	-	98,985.64	98,985.64	98,985.64		0.00
	Subtotal		243,737,440.95	90,351,960.85	8,050,281.14	98,402,241.99	98,402,241.99	90,351,960.85		8,050,281.14
304700-Struct & Imp-Store,Shop,Gar	304700-Struct & Imp-Store,Shop,Gar	304700	-	-	-	-	-	-		-
		304700	7,044,913.33	2,287,120.34	154,713.17	2,441,833.51	1,454,009.14	1,553,418.17		(99,409.03)
	304800-Other P/E-Intangible	304800	308,573.18	36,809.17	(14,666.13)	22,143.04	41,009.88	43,813.68		(2,803.80)
		304800	-	(273,453.89)	-	(273,453.89)	-	-		-
	304900-Other P/E-CPS	304900	1,138.85	1,138.85	(71.78)	1,067.07	1,138.85	1,138.85		0.00
		304900	638,325.02	374,850.00	(35,384.68)	339,465.32	236,404.11	236,404.11		0.00
	305000-Office Furniture & Equip	305000	1,390,992.67	386,854.07	(12,083.68)	374,770.39	496,825.53	496,825.53		0.00
		305000	55,523.31	41,635.14	-	41,635.14	14,178.64	14,178.64		0.00
	305100-Computer Software	305100	-	-	-	-	-	-		-
		305100	-	-	-	-	-	-		-

**CALIFORNIA AMERICAN WATER
RESERVE REALLOCATION
BY DISTRICT AT DECEMBER 31, 2020**

Per Book Data						Reallocation Accumulated Depreciation					
District	Function	Account	Plant	Life Reserve	COR Reserve	Total Reserve	Reallocated Life				
							Total Reserve	Reserve	Reallocated COR Reserve		
General		340300-Computer Software	50,834.04	8,621.29	-	8,621.29	340300 Total	3,515.79	3,515.79	0.00	
		340500-Other Office Equipment	-	(7,104.26)	-	(7,104.26)	340500 Total	0.00			
		341100-Trans Equip Lt Duty Trks	57,271.15	41,855.96	(26,453.94)	15,402.02	341100 Total	19,354.04	19,354.04	0.00	
		341200-Trans Equip Hvy Duty Trks	93,550.33	19,268.72	(13,492.52)	5,776.20	341200 Total	11,880.21	11,880.21	0.00	
		342000-Stores Equipment	5,601.49	779.63	-	779.63	342000 Total	859.92	859.92	0.00	
		343000-Tools,Shop,Garage Equip	242,498.28	112,128.62	(1,485.77)	110,642.85	343000 Total	86,325.13	86,325.13	0.00	
		345000-Power Operated Equipment	376,378.66	374,146.50	(48,977.84)	325,168.66	345000 Total	138,095.91	138,095.91	0.00	
		346100-Comm Equip Non-Telephone	50,388.25	8,387.84	(1.67)	8,386.17	346100 Total	9,992.04	9,992.04	0.00	
		346190-Remote Control & Instrument	1,372,370.99	544,489.34	(38,732.29)	505,757.05	346190 Total	804,938.07	804,938.07	0.00	
		347000-Misc Equipment	212,653.66	71,285.62	(573.86)	70,711.76	347000 Total	27,639.07	27,639.07	0.00	
		348000-Other Tangible Property	24,535.63	18,004.32	-	18,004.32	348000 Total	4,201.94	4,201.94	0.00	
		Total General	3,621,363.10	1,388,659.72	(138,718.74)	1,249,940.98	Subtotal	1,249,940.98	1,388,659.72	(138,718.74)	
		Total Ventura County	108,562,047.19	39,522,173.73	1,741,714.14	41,263,887.87	Total Ventura County	41,263,887.87	39,522,173.73	1,741,714.14	
	MONTEREY WASTEWATER										
Collection Plant		354400-WW Struct & Imp Treatment	1,948,343.38	867,574.37	(61,755.14)	805,819.23	354400 Total	1,192,130.31	1,260,651.10	(68,520.79)	
		355400-WW Pwr Gen Equip Treatment	8,128.04	(10,683.88)	(3,103.95)	(13,787.83)	355400 Total	3,197.79	3,381.59	(183.80)	
		360000-WW Collection Sewers Forced	33,232.89	8,622.93	240.39	8,863.32	360000 Total	11,200.47	11,844.25	(643.78)	
		361100-WW Collecting Mains	3,948,258.46	2,297,341.62	(4,729.67)	2,292,611.95	361100 Total	1,886,257.97	1,886,257.97	0.00	
		363000-WW Services Sewer	23,223.96	6,085.58	-	6,085.58	363000 Total	6,805.71	6,805.71	0.00	
Collection Plant Total			5,961,186.73	3,168,940.62	(69,348.37)	3,099,592.25	3,099,592.25				
Pumping Equipment		370000-WW Receiving Wells	19,454.86	10,899.35	435.54	11,334.89	370000 Total	3,933.23	4,343.52	(410.28)	
		371100-WW Pump Equip Elect	1,666,697.91	566,167.65	(54,828.65)	511,339.00	371100 Total	518,183.60	572,236.33	(54,052.73)	
		371200-WW Pump Equip Oth Pwr	21,151.35	8,848.06	(69.90)	8,778.16	371200 Total	9,335.21	9,335.21	0.00	
Pumping Equipment Total			1,707,304.12	585,915.06	(54,463.01)	531,452.05	531,452.05				
Treatment and Disposal		380000-WW TD Equipment	1,854,415.94	872,296.11	(24,770.68)	847,525.43	380000 Total	727,060.18	727,060.18	0.00	
		380100-WW TD Equip Sed Tanks/Acc	2,479,327.92	1,778,171.99	12,515.28	1,790,687.27	380100 Total	1,650,617.60	1,655,995.89	(5,378.28)	
		380200-WW TD Equip Sldge/Effl Rmv	44,331.48	(4,961.69)	(2,095.54)	(7,057.23)	380200 Total	18,159.59	18,218.76	(59.17)	
		380300-WW TD Equip Sldge Dry/Filt	306,821.94	130,195.25	2,519.83	132,715.08	380300 Total	188,968.04	189,583.76	(615.72)	
		380450-WW TD Equip Oth Sew Rem	845,021.32	312,794.10	7,879.19	320,673.29	380450 Total	505,594.00	507,241.40	(1,647.40)	
		380600-WW TD Equip Oth Disp	9,449.26	1,858.37	(2,042.25)	(183.88)	380600 Total	2,919.84	2,929.36	(9.51)	
		380625-WW TD Equip Gen Trmt	3,918,395.21	2,306,840.37	(5,731.54)	2,301,108.83	380625 Total	2,292,595.00	2,300,065.07	(7,470.07)	
		381000-WW Plant Sewers	90,541.65	64,425.03	(3,672.73)	60,752.30	381000 Total	56,865.98	57,051.27	(185.29)	
		382000-WW Outfall Sewer Lines	21,712.86	6,685.46	-	6,685.46	382000 Total	10,126.32	10,159.32	(33.00)	
	Treatment and Disposal Total			9,570,017.58	5,468,304.99	(15,398.44)	5,452,906.55	5,452,906.55			
General		389100-WW Oth Plt & Misc Equip Intang	52,635.92	38,763.40	-	38,763.40	389100 Total	52,635.92	52,635.92	0.00	
		389600-WW Other P/E - CPS	78,952.81	20,255.26	-	20,255.26	389600 Total	65,764.34	65,764.34	0.00	
		390000-WW Office Furniture & Equip	15,370.02	16,439.70	-	16,439.70	390000 Total	7,246.38	7,246.38	0.00	
		390200-WW Computers & Peripheral	-	(3,093.24)	-	(3,093.24)	0.00				
		391200-WW Trans Equip Hvy Dty Trks	408,966.71	125,818.64	13,590.29	139,408.93	391200 Total	93,265.25	80,011.11	13,254.14	
		393000-WW Tool Shop & Garage Equip	36,971.68	10,078.93	72.43	10,151.36	393000 Total	9,186.14	9,186.14	0.00	
		394000-WW Laboratory Equipment	50,467.73	37,486.73	(26.11)	37,460.62	394000 Total	23,898.04	23,898.04	0.00	
		395000-WW Power Operated Equip	20,000.00	14,130.48	(24.22)	14,106.26	395000 Total	7,387.30	7,387.30	0.00	
		396000-WW Communication Equip	62,531.38	9,294.39	(2.34)	9,292.05	396000 Total	14,650.96	14,650.96	0.00	
		397000-WW Misc Equipment	56,302.13	16,696.81	(355.91)	16,340.90	397000 Total	25,090.90	25,090.90	0.00	
	General Total			782,198.38	285,871.10	13,254.14	299,125.24	299,125.24			
	Total Monterey WW			18,020,706.81	9,509,031.77	(125,955.68)	9,383,076.09	9,383,076.09			

ATTACHMENT 7

CALIFORNIA AMERICAN WATER
SUMMARY OF EARNINGS AT PROPOSED RATES (\$ 1,000's)

Description	Central Division			
	Proposed Application	Final Application	Increase (decrease)	Notes
	2024	2024	2024	
Operating Revenues at Proposed rate	98,697.0	99,504.8	807.8	Calculated
Operation & Maintenance Exp				
Labor	10,229.4	10,312.9	83.6	Formula correction
Purchased Water	11,159.5	13,532.5	2,373.0	Incorporated most recent Purchased water cost
Purchased Power	3,015.2	2,994.0	(21.1)	Adjusted purchased power site type costs
Chemicals	672.2	632.2	(40.0)	Updated unit cost based on most recent forecasts
Operation Expense	2,778.3	2,778.3	0.0	N/A
Maintenance (excluding Amort Tank Painting)	2,802.5	2,802.5	0.0	N/A
Amortization of Tank Painting	987.6	987.6	0.0	N/A
Customer Accounting	457.3	457.3	0.0	N/A
Uncollectible Expense	4,111.4	4,115.6	4.2	Calculated
Insurance	665.4	665.4	0.0	N/A
Pensions and Benefits	2,538.4	2,375.9	(162.5)	Updated base on Willis Towers Watson actuarial projection
Regulatory Expenses	157.7	157.7	0.0	N/A
Rents	913.2	789.7	(123.5)	Updated base on lease schedule
Other Administrative & General	4,529.3	4,454.0	(75.2)	Removed acquisition transaction costs. Updated Transporation fuel cost
Service Company Costs	3,158.1	3,220.3	62.2	Pension & OPEB updated base on Willis Towers Watson actuarial projection
Citizens Acquisition Premium	877.8	877.8	0.0	N/A
General Office Return on Rate Base	1,550.0	1,504.3	(45.7)	Updated capital budget forecasts
San Clemente Dam	6,245.4	6,245.4	0.0	N/A
Return on T&D Net Plant Consolidation	0.0	(1,449.8)	(1,449.8)	Transfer from rate design to revenue requirement calculation
Total O&M expenses	56,848.6	57,453.7	605.1	Calculated
Depreciation	11,465.1	11,435.6	(29.5)	Calculated
General Taxes	3,942.4	3,971.5	29.2	Calculated
Total Operating Expenses	72,256.1	72,860.9	604.8	Calculated
Income Before Income Taxes	26,440.9	26,643.9	203.1	Calculated
State Income Taxes	1,721.6	1,735.8	14.2	Calculated
Federal income Taxes	3,516.3	3,575.3	59.0	Calculated
Total Income Taxes	5,237.9	5,311.1	73.2	Calculated
TOTAL EXPENSES	77,494.0	78,171.9	677.9	Calculated
Utility Operating Income	21,203.0	21,332.9	129.9	Calculated
Average Rate Base	278,619.8	280,326.7	1,706.9	Corrections to CIAC &CAC calculation; Reduction to OH for MPWSP;T&D consolidation; revision to SCEP
Return on Rate Base	7.61%	7.61%	0.00%	
Present Rate Revenue	85,850.7	86,581.6	730.9	Incorporated most recent Purchased water cost ;Correction to present rate revenue calculation; update to late payment fee in other revenue
increase \$	12,846.3	12,923.2	76.9	Calculated
Increase	14.96%	14.93%	-0.04%	Calculated

CALIFORNIA AMERICAN WATER
SUMMARY OF EARNINGS AT PROPOSED RATES (\$ 1,000's)

Description	Southern Division			
	Proposed Application	Final Application	Increase (decrease)	Notes
	2024	2024	2024	
Operating Revenues at Proposed rate	147,886.0	148,356.2	470.2	Calculated
Operation & Maintenance Exp				
Labor	10,161.0	10,348.0	187.0	Formula correction
Purchased Water	57,599.3	57,859.1	259.8	Incorporated most recent Purchased water cost
Purchased Power	3,424.6	3,388.5	(36.1)	Adjusted purchased power site type costs
Chemicals	197.2	223.5	26.4	Updated unit cost based on most recent forecasts
Operation Expense	2,032.0	2,032.0	0.0	N/A
Maintenance (excluding Amort Tank Painting)	1,616.8	1,616.8	0.0	N/A
Amortization of Tank Painting	386.8	386.8	0.0	N/A
Customer Accounting	959.1	959.1	0.0	N/A
Uncollectible Expense	1,052.0	1,054.4	2.4	Calculated
Insurance	1,163.7	1,163.7	0.0	N/A
Pensions and Benefits	2,704.8	2,511.1	(193.7)	Updated base on Willis Towers Watson actuarial projection
Regulatory Expenses	299.9	299.9	0.0	N/A
Rents	1,090.6	1,015.5	(75.1)	Update base on lease schedule
Other Administrative & General	4,883.8	4,741.3	(142.6)	Removed acquisition transaction costs. Updated Transporation fuel cost
Service Company Costs	6,007.2	6,125.5	118.4	Pension & OPEB updated base on Willis Towers Watson actuarial projection
Citizens Acquisition Premium	1,669.8	1,669.8	0.0	N/A
General Office Return on Rate Base	2,948.4	2,861.4	(87.0)	Updated capital budget forecasts
San Clemente Dam	0.0	0.0	0.0	N/A
Return on T&D Net Plant Consolidation	0.0	769.7	769.7	Transfer from rate design to revenue requirement calculation
Total O&M expenses	98,197.0	99,026.2	829.3	Calculated
Depreciation	14,850.4	14,832.8	(17.6)	Calculated
General Taxes	5,128.6	5,195.5	66.8	Calculated
Total Operating Expenses	118,176.0	119,054.5	878.5	Calculated
Income Before Income Taxes	29,710.0	29,301.7	(408.3)	Calculated
State Income Taxes	1,942.0	1,915.2	(26.7)	Calculated
Federal income Taxes	4,204.3	4,143.5	(60.8)	Calculated
Total Income Taxes	6,146.3	6,058.7	(87.6)	Calculated
TOTAL EXPENSES	124,322.3	125,113.2	790.9	Calculated
Utility Operating Income	23,563.7	23,243.0	(320.8)	Calculated
Average Rate Base	309,641.6	305,426.6	(4,215.0)	Corrections to CIAC & CAC calculation; Reduction to OH for MPWSP; T&D consolidation; revision to SCEP
Return on Rate Base	7.61%	7.61%	0.00%	
Present Rate Revenue	126,295.3	126,140.6	(154.7)	Correction to present rate revenue calculation; update to late payment fee in other revenue
increase \$	21,590.7	22,215.6	624.8	Calculated
Increase	17.10%	17.61%	0.52%	Calculated

CALIFORNIA AMERICAN WATER
SUMMARY OF EARNINGS AT PROPOSED RATES (\$ 1,000's)

Description	Northern Division			
	Proposed Application	Final Application	Increase (decrease)	Notes
	2024	2024	2024	
Operating Revenues at Proposed rate	100,179.7	101,577.4	1,397.7	Calculated
Operation & Maintenance Exp				
Labor	10,296.1	10,482.8	186.8	Formula correction
Purchased Water	4,636.1	4,636.1	0.0	N/A
Purchased Power	4,123.6	4,070.7	(52.9)	Adjusted purchased power site type costs
Chemicals	399.6	480.6	81.0	Updated unit cost based on most recent forecasts
Operation Expense	3,800.3	3,800.3	0.0	N/A
Maintenance (excluding Amort Tank Painting)	1,561.0	1,561.0	0.0	N/A
Amortization of Tank Painting	599.3	599.3	0.0	N/A
Customer Accounting	1,255.9	1,255.9	0.0	N/A
Uncollectible Expense	699.7	707.0	7.3	Calculated
Insurance	1,198.8	1,198.8	0.0	N/A
Pensions and Benefits	2,701.0	2,509.5	(191.5)	Updated base on Willis Towers Watson actuarial projection
Regulatory Expenses	287.0	287.0	0.0	N/A
Rents	525.7	525.7	0.0	N/A
Other Administrative & General	5,542.3	5,302.5	(239.8)	Removed acquisition transaction costs. Updated Transporation fuel cost
Service Company Costs	5,748.4	5,861.7	113.3	Pension & OPEB updated base on Willis Towers Watson actuarial projection
Citizens Acquisition Premium	1,770.4	1,770.4	0.0	N/A
General Office Return on Rate Base	2,821.4	2,738.1	(83.3)	Updated capital budget forecasts
San Clemente Dam	0.0	0.0	0.0	N/A
Return on T&D Net Plant Consolidation	0.0	680.1	680.1	Transfer from rate design to revenue requirement calculation
Total O&M expenses	47,966.8	48,467.7	500.8	Calculated
Depreciation	16,374.8	17,555.2	1,180.4	Calculated
General Taxes	4,460.7	4,013.3	(447.4)	Calculated
Total Operating Expenses	68,802.3	70,036.1	1,233.8	Calculated
Income Before Income Taxes	31,377.4	31,541.3	163.9	Calculated
State Income Taxes	2,049.8	2,060.3	10.5	Calculated
Federal income Taxes	4,372.3	4,388.9	16.6	Calculated
Total Income Taxes	6,422.1	6,449.2	27.1	Calculated
TOTAL EXPENSES	75,224.4	76,485.3	1,260.9	Calculated
Utility Operating Income	24,955.3	25,092.1	136.8	Calculated
Average Rate Base	327,927.6	329,725.4	1,797.9	Corrections to CIAC &CAC calculation and working cash operational; Reduction to OH for MPWSP; Removal of Larkfield fire recovery tank and BPS; T&D consolidation; revision to SCEP
Return on Rate Base	7.61%	7.61%	0.00%	
Present Rate Revenue	81,143.6	81,672.3	528.8	Correction to present rate revenue calculation; update to late payment fee in other revenue
increase \$	19,036.1	19,905.1	868.9	Calculated
Increase	23.46%	24.37%	0.91%	Calculated

CALIFORNIA AMERICAN WATER
SUMMARY OF EARNINGS AT PROPOSED RATES (\$ 1,000's)

Description	Monterey Waste Water			
	Proposed Application	Final Application	Increase (decrease)	Notes
	2024	2024	2024	
Operating Revenues at Proposed rate	4,469.9	4,467.0	(2.9)	Calculated
Operation & Maintenance Exp				
Labor	1,324.7	1,326.9	2.3	Formula correction
Purchased Water	0.0	0.0	0.0	N/A
Purchased Power	269.2	269.2	0.0	N/A
Chemicals	438.0	468.0	30.0	Updated unit cost based on most recent forecasts
Operation Expense	408.4	408.4	0.0	N/A
Maintenance (excluding Amort Tank Painting)	242.7	242.7	0.0	N/A
Amortization of Tank Painting	0.0	0.0	0.0	N/A
Customer Accounting	31.1	31.1	0.0	N/A
Uncollectible Expense	23.3	23.3	(0.0)	N/A
Insurance	36.7	36.7	0.0	N/A
Pensions and Benefits	304.0	283.7	(20.3)	Updated base on Willis Towers Watson actuarial projection
Regulatory Expenses	4.3	4.3	0.0	N/A
Rents	7.3	7.3	0.0	N/A
Other Administrative & General	245.4	245.0	(0.4)	Removed acquisition transaction costs. Updated Transporation fuel cost
Service Company Costs	86.1	87.8	1.7	Pension & OPEB updated base on Willis Towers Watson actuarial projection
Citizens Acquisition Premium	0.0	0.0	0.0	N/A
General Office Return on Rate Base	42.3	41.0	(1.2)	Updated capital budget forecasts
San Clemente Dam	0.0	0.0	0.0	N/A
Return on T&D Net Plant Consolidation	0.0	0.0	0.0	N/A
Total O&M expenses	3,463.5	3,475.4	12.0	Calculated
Depreciation	325.3	324.6	(0.7)	Calculated
General Taxes	138.2	138.3	0.2	Calculated
Total Operating Expenses	3,927.0	3,938.4	11.4	Calculated
Income Before Income Taxes	542.9	528.6	(14.3)	Calculated
State Income Taxes	35.4	34.5	(0.9)	Calculated
Federal income Taxes	75.1	73.5	(1.6)	Calculated
Total Income Taxes	110.5	108.0	(2.5)	Calculated
TOTAL EXPENSES	4,037.5	4,046.4	8.9	Calculated
Utility Operating Income	432.4	420.6	(11.8)	Calculated
Average Rate Base	5,681.8	5,526.9	(154.8)	Corrections to CIAC &CAC calculation; Reduction to OH for MPWSP; revision to SCEP
Return on Rate Base	7.61%	7.61%	0.00%	
Present Rate Revenue	3,762.8	3,739.5	(23.4)	Correction to present rate revenue calculation; update to late payment fee in other
increase \$	707.0	727.5	20.5	Calculated
Increase	18.79%	19.45%	0.67%	Calculated